

Page 1	Page 3
<p>IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION CHARLENE CARTER)) CIVIL ACTION NO. VS.) 3:17-CV-02278-X) SOUTHWEST AIRLINES CO., AND) TRANSPORT WORKERS UNION OF) AMERICA, LOCAL 556)</p> <p>----- CONFIDENTIAL VIDEOTAPED DEPOSITION OF MEGGAN JONES NOVEMBER 4, 2020 -----</p> <p>ANSWERS AND DEPOSITION OF MEGGAN JONES, produced as a witness at the instance of the Plaintiff, taken in the above-styled and -numbered cause on NOVEMBER 4, 2020, at 9:05 a.m., before CHARIS M. HENDRICK, a Certified Shorthand Reporter in and for the State of Texas, witness located in Golden, Colorado, pursuant to the Federal Rules of Civil Procedure, the current emergency order regarding the COVID-19 State of Disaster, and the provisions stated on the record or attached hereto.</p>	<p style="text-align: center;">1 INDEX 2 Appearances 2 3 MEGGAN JONES 4 Examination by Mr. Gilliam..... 5 5 Examination by Mr. Correll..... 84 6 7 Signature and Changes..... 87 8 Reporter's Certificate..... 89 9 10 EXHIBITS 11 Exhibit 3 - 39 Email to Suzanne Stephensen from Audrey Stone, 12 Document 1 13 Exhibit 4 - 36 Email to Suzanne Stephensen from Dave Kissman, 14 Document 2 15 Exhibit 6 - 62 Email to Maureen Emlet from Ed Schneider, 16 Document 9 17 18 19 20 21 22 23 24 25</p>
Page 2	Page 4
<p>1 A P P E A R A N C E S 2 FOR THE PLAINTIFF: 3 MR. MATTHEW B. GILLIAM NATIONAL RIGHT TO WORK LEGAL DEFENSE 4 FOUNDATION, INC. 8001 Braddock Road, Suite 600 5 Springfield, Virginia 22160 (703) 770-3339 6 mbg@nrtw.org 7 FOR THE DEFENDANT, SOUTHWEST AIRLINES CO.: 8 9 MR. MICHAEL A. CORRELL REED SMITH LLP 2850 North Harwood, Suite 1500 10 Dallas, Texas 75201 (469) 680-4264 11 mcorrell@reedsmit.com 12 FOR THE DEFENDANT, TRANSPORT WORKERS UNION OF 13 AMERICA, LOCAL 556: 14 MR. ADAM GREENFIELD MR. EDWARD B. CLOUTMAN, III 15 LAW OFFICES OF CLOUTMAN & GREENFIELD, PLLC 3301 Elm Street 16 Dallas, Texas 75226 (214) 939-9223 17 agreenfield@candglegal.com ecloutman@lawoffices.email 18 19 ALSO PRESENT: MR. MACK SPURLOCK - VIDEOGRAPHER 20 21 MS. CHARLENE CARTER MS. LAUREN ARMSTRONG</p>	<p>1 PROCEEDINGS 2 THE VIDEOGRAPHER: We are now on 3 record. Today's date is November 4th, 2020. The 4 time is 9:05 a.m. Central. Will the court reporter 5 please swear in the witness? 6 THE REPORTER: This is the videotaped 7 deposition of Meggan Jones, and it is being 8 conducted remotely in accordance with the current 9 emergency order regarding the COVID-19 State of 10 Disaster. The witness is located in Golden, 11 Colorado. Counsel has agreed that I can swear in 12 the witness from -- in -- out of state. 13 My name is Charis Hendrick, Court 14 Reporter, CSR No. 3469. I am administering the 15 oath and reporting the deposition remotely by 16 stenographic means from my home in Ellis County, 17 Texas. 18 Would counsel please state their 19 appearances and locations for the record? And the 20 city is fine. 21 MR. GILLIAM: Matthew B. Gilliam for 22 plaintiff Charlene Carter in Springfield, Virginia. 23 MR. CORRELL: Mike Correll for 24 defendant Southwest Airlines in Dallas, Texas. 25 MR. GREENFIELD: Adam Greenfield on</p>

Page 5

1 behalf of defendant TWU Local 556 from Dallas,
 2 Texas.

3 MR. CLOUTMAN: And Ed Cloutman also
 4 for TWU Local 556, Dallas, Texas.

5 MEGGAN JONES,
 6 having been first duly sworn, testified as follows:

7 EXAMINATION

8 BY MR. GILLIAM:

9 Q. Good morning, Ms. Jones. My name is --

10 A. Morning.

11 Q. My name is Matt Gilliam and I'm the
 12 attorney representing Charlene Carter in the matter
 13 of Carter v. Southwest Airlines and Transport
 14 Workers Union of America Local 556. And I am here
 15 today to ask you some questions about the case. If
 16 at any point you need a break, just let me know and
 17 we can take a break. Have you been deposed before?

18 A. I have not.

19 Q. Okay. So, basically, the way it works is
 20 I will -- I will ask you some questions, and if you
 21 could just answer to the best of your ability.
 22 Since the reporter is preparing a written
 23 transcript, it's important that you give clear,
 24 verbal answers; no huh-uhs and uh-huhs and no head
 25 nods or gestures.

Page 6

1 We also need to both make sure that we
 2 don't talk over each other so that we make a clear
 3 record. So if you could just let me finish my
 4 question before you answer, and I will do my best
 5 to make sure that I let you finish your answer
 6 before I ask my next question; under -- understand
 7 all that?

8 A. I do, yes.

9 Q. Okay. And if you don't understand my
 10 question, let me know; otherwise, I will assume
 11 that you understood.

12 Have you read the Complaint in this
 13 case?

14 A. I have not.

15 Q. Okay. Are you familiar with Ms. Carter's
 16 claims in this case?

17 A. Not really. Not entirely.

18 Q. Okay. Do you know that Ms. -- Ms. Carter
 19 makes a claim against both Southwest and Transport
 20 Workers Union of America Local 556 that they --
 21 they violated her rights under Title 7 Civil Rights
 22 Act?

23 A. No.

24 Q. Okay. And you are -- you are not aware
 25 either that she makes a claim that the union

1 violated its duty of fair representation to her?

2 A. No, I am not aware of that.

3 Q. Okay. And are you aware that she makes a
 4 claim that her rights were violated under the
 5 Railway Labor Act?

6 A. Yes, I am aware of that.

7 Q. Okay. Okay. And you are -- you are aware
 8 of her allegation that both the union and Southwest
 9 re- -- retaliated against her exercise of rights
 10 under the Railway Labor Act?

11 A. Not -- not against the union; I was not
 12 aware of that. But against the company, yes, I was
 13 aware of that.

14 Q. Okay. Well, just shifting gears a little
 15 bit, how long have you worked at Southwest?

16 A. Nine and a half years.

17 Q. Okay. And what is your current occupation
 18 with Southwest?

19 A. I am a senior manager of labor
 20 administration.

21 Q. Okay. And how long have you held that
 22 position?

23 A. For approximately three months.

24 Q. Okay. And who do you report to in that
 25 position?

Page 8

1 A. Tammy Shaffer.

2 Q. Okay. And is that in Southwest labor
 3 relations department?

4 A. Yes, it is.

5 Q. Okay. And prior to holding your current
 6 position with Southwest, what was your position
 7 with the company?

8 A. Inflight base manager at the Phoenix base.

9 Q. Okay. And how long were you the -- the
 10 base manager at the Phoenix base?

11 A. Officially, approximately a year and a
 12 half; just over a year and a half.

13 Q. Do you know when you started your -- your
 14 job there in Phoenix as inflight base manager?

15 A. I was formally offered the position in
 16 January of 2019.

17 Q. Okay. Did you start in January 2019?

18 A. I worked there as a temporary base manager
 19 for four months prior.

20 Q. Okay. Okay. And prior to working in
 21 Phoenix, what job did you hold with the company?

22 A. I was the assistant base manager at the
 23 Denver inflight base.

24 Q. Okay. And how long were you assistant
 25 base manager in Denver?

Page 9

Page 11

1 **A. Approximately, three and a half to four**
 2 **years, approximately.**

3 Q. And so when did you start your -- I guess,
 4 your job in that position?

5 **A. It was in 2015. I don't recall the exact**
 6 **month.**

7 Q. Okay. And did you leave that position in
 8 2018?

9 **A. Officially left it in January of 2019.**

10 Q. Okay.

11 **A. My title changed.**

12 Q. Okay. All right. And prior to being
 13 assistant base manager in Denver, what -- what job
 14 did you hold with the company?

15 **A. I was an inflight supervisor at the Denver**
 16 **base.**

17 Q. Okay. And how long were you an inflight
 18 supervisor?

19 **A. With Southwest, 2011 is when I started.**
 20 **So, approximately, four years, give or take.**

21 Q. Okay. And did you work with Southwest
 22 prior to 2011?

23 **A. No, I did not.**

24 Q. Okay. Have you ever worked as a flight
 25 attendant?

1 **There is a wide variety of responsibility.**

2 Q. Okay. And who did you report to as
 3 assistant base manager?

4 **A. Ed Schneider.**

5 Q. Okay. Did you report to anyone else or
 6 only Ed Schneider?

7 **A. I had previous base managers, but Ed was**
 8 **the -- there is only one base manager, and Ed is**
 9 **the most recent person that I had reported to at**
 10 **the Denver base.**

11 Q. Okay. And did you ever have, in the
 12 regular course of business, communications with
 13 Ed's supervisors?

14 **A. Like, Ed's -- you mean Ed's leaders?**

15 Q. Well, I don't know about the term
 16 "leader," so, yeah, I -- I guess I should be
 17 careful with supervisor.

18 So let me back up this way: Who did
 19 Ed report to?

20 **A. Ed reported to Dave Kissman.**

21 Q. Okay. And in the regular course of
 22 business, did you have communications with Dave
 23 Kissman?

24 **A. Yes. Sometimes.**

25 Q. Okay. And who did Dave Kissman report to?

Page 10

Page 12

1 **A. Yes, I have.**

2 Q. Okay. Which company -- for which company
 3 did you work as a flight attendant?

4 **A. America West Airlines.**

5 Q. Okay. And were you a member of the union
 6 when you worked at -- as a flight attendant at
 7 American West?

8 **A. Yes, I was.**

9 Q. Okay. Okay. What was the union?

10 **A. It was the AFA.**

11 Q. Okay. And did you hold any elected
 12 offices with your union?

13 **A. I did not, no.**

14 Q. All right. Well, so while you were
 15 assistant base manager in Denver, what were your
 16 job responsibilities?

17 **A. My job was to support the base staff,**
 18 **support the flight attendants and to also support**
 19 **the base manager.**

20 Q. Okay. Did you have any other
 21 responsibilities?

22 **A. That support included, you know,**
 23
 24 **like, potential work and conduct violations. It**
 25 **included staff development, things like that.**

1 **A. At that time, I am not entirely certain --**

2 Q. Okay.

3 **A. -- who he reported to.**

4 Q. Okay. All right. And did you have --
 5 have individuals who reported directly to you?

6 **A. Yes, I did.**

7 Q. Okay. And, I guess, what positions at the
 8 Southwest base reported to you as assistant base
 9 manager?

10 **A. I had several supervisors -- inflight**
 11 **supervisors and several inflight coordinators**
 12 **report directly to me.**

13 Q. How many inflight coordinators reported to
 14 you?

15 **A. It would vary depending on our team**
 16 **structure, but I couldn't tell you. I don't**
 17 **remember how many I had most recently in that**
 18 **position.**

19 Q. In 2017, do you remember how many inflight
 20 coordinators reported to you?

21 **A. I don't. I am sorry. I don't --**

22 Q. Okay.

23 **A. -- remember that.**

24 Q. And do you remember how many of the
 25 supervisors reported to you?

Page 13

1 **A. I don't remember how many -- what the team**
 2 **split was at that point.**

3 Q. Okay. All right. Did you have anybody
 4 else who reported to you?

5 **A. No.**

6 Q. Okay. Now, did you directly supervise
 7 flight attendants?

8 **A. Not directly.**

9 Q. Okay. Who -- who were the -- I am sorry.
 10 Who were the flight attendants -- again, I have to
 11 word this very carefully.

12 So who did the flight attendants
 13 report to?

14 **A. They would report to inflight supervisors**
 15 **directly.**

16 Q. Okay. All right. Now, while you were
 17 assistant base manager in Denver, did you know
 18 Charlene Carter, the plaintiff in this case?

19 **A. Yes, I did.**

20 Q. Okay. How did you come to know
 21 Ms. Carter?

22 **A. Just from her being a flight attendant**
 23 **there, coming in to report for her trips; that's**
 24 **how.**

25 Q. Okay. And who -- do you recall who her

Page 14

1 supervisor was?

2 **A. I don't recall who it was.**

3 Q. Okay. Let's see. Now, were there other
 4 assistant base managers in the Denver region?

5 **A. At the Denver base, yes.**

6 Q. Yes. Okay. And what were their names?

7 **A. Hector Barrera and Dustin Moore.**

8 Q. Okay. And they were assistant base
 9 managers in 2017?

10 **A. Yes.**

11 Q. Okay. Did you work with them on any
 12 issues?

13 **A. Can you be more specific?**

14 Q. Yeah. For instance, in -- I guess, in --
 15 enforcing work policies -- or excuse me. Let me
 16 ask it another way.

17 In investigating work and conduct
 18 violations, did you work with the other assistant
 19 base managers?

20 **A. Sometimes.**

21 Q. Okay. And on -- when -- when would you be
 22 required to work with another assistant base
 23 manager on a work-violation issue?

24 MR. CORRELL: Objection. Misstates
 25 prior testimony. And, Ms. Jones, when I make

Page 13

Page 15

1 objections today, unless I specifically tell you
 2 you cannot answer the question or do not answer the
 3 question, you should go ahead and answer. Thank
 4 you.

5 THE WITNESS: Okay.

6 **A. Can you repeat the question? I am sorry.**

7 Q. (By Mr. Gilliam) Yeah. So when -- when
 8 investigating a -- a work violation, did you have
 9 occasion to work with the other assistant base
 10 managers?

11 **A. Yes.**

12 Q. Okay. And I -- and I guess it was on --
 13 only on some occasions you would work with the
 14 other assistant base managers?

15 **A. Yes. Correct.**

16 Q. Okay. And what -- what types of work
 17 violations would you work with them on?

18 **A. Any of them that would happen to come up,**
 19 **there would be an array of different violations**
 20 **that we would work together on.**

21 Q. Okay. Were there particular types of
 22 matters that you had to coordinate with them on?

23 **A. It just would depend on the nature of the**
 24 **investigation or potential investigation. We**
 25 **primarily would work together to take notes for the**

Page 14

Page 16

1 supervisor was?

2 **A. other person if they needed a notetaker, things**
 3 **like that.**

4 Q. Okay. Is there something about -- what
 5 about the nature of the investigation would require
 6 your collaboration with other assistant base
 7 managers?

8 **A. Experience level of the assistant manager**
 9 **handling the case would sometimes dictate that**
 10 **collaboration. If they were newer and they needed,**
 11 **you know, to talk through something and understand,**
 12 **you know, how to -- how we normally handle this or,**
 13 **you know, what is the best approach here; that type**
 14 **of collaboration.**

15 Q. Okay. All right. Okay. Did -- did you
 16 work in close proximity to the other base manager
 17 -- the other assistant base managers?

18 **A. Yes, I did.**

19 Q. Okay. Was your office, like, next door to
 20 theirs?

21 **A. Yes.**

22 Q. Okay. And was your office in close
 23 proximity to -- to Mr. Schneider's?

24 **A. Yes.**

25 Q. Okay. And where in relation to
 26 Mr. Schneider's office was your office?

Page 17

Page 19

1 **A. His office was diagonally across from**
 2 mine.
 3 Q. Okay. All right. Now, do you know how
 4 many investigation of work violations -- excuse me.
 5 Do you know how many work-violation
 6 investigations you participated in as an assistant
 7 base manager?
 8 **A. I don't know the number.**
 9 Q. Okay. Was it -- was it a lot?
 10 **A. Yes, it was a lot.**
 11 Q. Okay. Were you having to conduct
 12 work-violation investigations on a monthly basis or
 13 how frequently did you have to conduct --
 14 **A. It was driven by the -- just what was**
 15 **happening with the flight attendants. So it would**
 16 **just vary on -- on how busy we would be from month**
 17 **to month. So I can't say that we did them every**
 18 **month, but we did them frequently.**
 19 Q. Do you know, roughly, about how many
 20 disciplinary incidents you had at the Denver base
 21 each year?
 22 **A. I don't know.**
 23 Q. Okay. Do you know if it was over five?
 24 **A. Yes, it was over five.**
 25 Q. Okay. Do you know if it was over 10 a

1 **directly involved, necessarily, but I would always**
 2 **make him aware that something was happening.**
 3 Q. Okay. Did Ed ever conduct workplace
 4 violations on his own without the involvement of
 5 his assistant base managers?
 6 **A. Yes.**
 7 MR. CORRELL: Objection. Calls for
 8 speculation. Take your time after a question just
 9 so I can jump in, Ms. Jones.
 10 THE WITNESS: Okay. No problem.
 11 Q. (By Mr. Gilliam) And I'll -- I'll ask it
 12 again just for the -- the -- the record. Do you
 13 know if Ed Schneider conducted any workplace
 14 violations on his own without the involvement of
 15 his assistant base managers?
 16 **A. Ed has the authority to do that. I**
 17 **couldn't give you a specific example.**
 18 Q. Okay. Did -- did Ed ordinarily have his
 19 assistant base managers assist him with
 20 investigations of a disciplinary matter?
 21 **A. I don't know.**
 22 Q. Okay. Now, did you have the -- did you
 23 have the authority to issue any discipline to a
 24 flight attendant without Ed's approval?
 25 **A. No. We had to get Ed's approval.**

Page 18

Page 20

1 year?
 2 **A. Yes. There were more than 10 a year.**
 3 Q. Okay. Were there more than 50
 4 disciplinary incidents a year?
 5 **A. I don't know.**
 6 Q. Okay. Okay. More than 10. Do you know
 7 if it was more than 20 a year?
 8 **A. I don't know.**
 9 Q. Okay. Okay. And when -- when there was a
 10 need to investigate a work -- I guess, a work
 11 violation, did -- did you conduct those
 12 investigations on your own?
 13 **A. What do you mean by on my own?**
 14 Q. Did you -- I guess, did you have authority
 15 to investigate a work -- workplace violation
 16 without the involvement of Ed Schneider?
 17 **A. Yes.**
 18 Q. Okay. And do you know how often you
 19 conducted the work -- like, the -- the work rule
 20 violations -- well, let me be careful with terms
 21 here again.
 22 Do you know how often you conducted
 23 investigation of a workplace violation without Ed's
 24 involvement?
 25 **A. No, I don't know. Ed -- Ed wouldn't be**

1 **Q. Okay. After investigating a matter, did**
 2 **he have to approve your decision to issue or even**
 3 **not to issue discipline to a flight attendant?**
 4 **A. Yes.**
 5 Q. Okay. Now, in doing investigation of some
 6 -- well, in conducting investigations of
 7 disciplinary matters, did you ever deal with
 8 violations of Southwest's social media policy?
 9 **A. Did I personally handle those types of**
 10 **investigations?**
 11 Q. Were you ever involved in any social media
 12 policy violation investigation?
 13 **A. Yes, I was.**
 14 Q. Okay. And did you ever conduct any of the
 15 social media policy violation investigations on
 16 your own?
 17 **A. I can't remember if I did them alone or**
 18 **not.**
 19 Q. Okay. Do you know how many reports of a
 20 social media policy violation the Denver base
 21 received each year?
 22 **A. I don't know.**
 23 Q. Do you know if it was more than 10 a year?
 24 **A. I don't know.**
 25 Q. Okay. You just know that they -- they

Page 21

Page 23

1 happened, or at least there were complaints of a
 2 social media policy violation and you investigated
 3 it?

4 **A. Yes.**

5 Q. Okay. Do -- do you know how many of those
 6 reports resulted in the discipline of a flight
 7 attendant?

8 **A. I don't know.**

9 Q. Okay. Do you know if a Denver-base flight
 10 attendant was ever terminated for a violation of
 11 the social media policy?

12 **A. I don't know.**

13 Q. Okay.

14 **A. I mean, are you -- I am sorry. To
 15 clarify, are you referring to prior to Charlene
 16 or --**

17 Q. Ever in your whole -- the whole time
 18 working at the Denver base.

19 **A. Can you ask me again? I am sorry.**

20 Q. Sure. So in your whole time working as an
 21 assistant base manager in Denver, was there ever a
 22 flight attendant who was terminated for a violation
 23 of the social media policy?

24 **A. Yes, there was.**

25 Q. Okay. And how many of those terminations

1 Feldhausen's violation of the social policy?

2 **A. She made a post that was offensive in
 3 nature. Another Southwest Airlines employee
 4 reported it.**

5 Q. Okay. When did that incident occur?

6 **A. I don't know exactly when that was.**

7 Q. Did that occur while you were working as a
 8 base manager in Phoenix?

9 **A. Yes, yes.**

10 Q. Okay. So that would have been after
 11 January 2019?

12 **A. Yes.**

13 Q. Okay. And do you remember who had
 14 reported Tammy Feldhausen?

15 **A. I don't remember.**

16 Q. Okay. What was the offensive post that
 17 Tammy Feldhausen made?

18 **A. I don't remember the exact contents of it.**

19 Q. Okay. What -- what about the contents do
 20 you remember?

21 **A. That it was racially motivated, but I
 22 don't remember exactly what it said.**

23 Q. Okay. Do you remember any other details
 24 about the -- the post?

25 **A. I don't. I am sorry.**

Page 22

Page 24

1 were there?

2 **A. I don't know how many terminations there
 3 were.**

4 Q. Okay. How many terminations do you
 5 recall?

6 **A. I definitely recall one.**

7 Q. Okay. And which one was that?

8 **A. Charlene Carter.**

9 Q. Okay. Do you remember -- you don't
 10 remember any other social media violations --

11 **A. I don't.**

12 Q. -- that resulted in termination?

13 **A. I don't remember that at the Denver base.**

14 Q. Okay. Do you know -- do you recall any
 15 other terminations of a flight attendant under the
 16 social media policy?

17 **A. Yes.**

18 Q. Okay. What were some of the other ones
 19 you recall?

20 **A. I had a Phoenix-based flight attendant
 21 that was terminated under that policy.**

22 Q. Okay. And who was the Phoenix-based
 23 flight attendant who was terminated?

24 **A. Tammy Feldhausen.**

25 Q. Okay. And what -- what was Tammy

1 Q. And do you remember -- well, was there any
 2 other conduct that Tammy Feldhausen was terminated
 3 for?

4 **A. I don't believe so.**

5 Q. Okay. All right. Do you remember any
 6 other terminations at Southwest for a social media
 7 policy violation?

8 **A. I don't know. I don't recall any other
 9 terminations.**

10 Q. Okay. Now, are you familiar with
 11 Southwest's workplace bullying and hazing policy?

12 **A. I am familiar with it.**

13 Q. Okay. Do you remember whether any flight
 14 attendants at the Denver base were -- were
 15 disciplined for violating the workplace bullying
 16 and hazing policy?

17 **A. I don't remember.**

18 Q. Okay. And I think I asked specifically
 19 about the Denver base. Do you remember whether --
 20 do you remember any cases at Southwest of a flight
 21 attendant -- excuse me -- being disciplined for a
 22 violation of the workplace bullying and hazing
 23 policy?

24 **A. I don't -- I don't know. I don't remember
 25 anything right now.**

Page 25

1 Q. Okay. And are you familiar with
 2 Southwest's policy concerning harassing --
 3 harassment, sexual harassment, discrimination and
 4 retaliation?

5 **A. Yes.**

6 Q. Okay. Do you know of any flight
 7 attendants at the Denver base who were fired for
 8 violating that policy?

9 **A. Yes.**

10 Q. Okay. And how many flight attendants do
 11 you remember being fired for that policy?

12 **A. I can only recall -- excuse me -- two.**

13 Q. Okay. And who are the two that you
 14 recall?

15 **A. Charlene Carter and an employee named**
 16 **Ralph Garrett, former employee.**

17 Q. Okay. And Ralph Garrett was a flight
 18 attendant?

19 **A. Yes.**

20 Q. Okay. And apart from termination, do you
 21 know whether any of the flight attendants at the
 22 Denver base were -- were disciplined in any other
 23 way for violating that sexual harassment policy?

24 **A. I don't know.**

25 Q. Okay. And what do you remember about

Page 26

1 Ralph Garrett's violation?

2 **A. It was primarily sexual harassment.**

3 Q. Okay. What -- what was the conduct that
 4 he engaged in that violated the rule?

5 **A. Several employees had reported that he**
 6 **made inappropriate remarks to them and our**
 7 **customers.**

8 Q. What were the inappropriate remarks?

9 **A. I don't remember all of them.**

10 Q. Okay. What do you remember?

11 **A. He made a remark to more than one flight**
 12 **attendant about them having DSL, which he stated**
 13 **was dick-sucking lips.**

14 Q. Okay.

15 **A. And he was singing a song that was**
 16 **inappropriate. Like, he was humming it and singing**
 17 **it around those flight attendants. And he was**
 18 **flirting with a 14-year-old girl on an airplane.**

19 Q. Okay. Okay. Was he terminated for
 20 violations of any other policies as well or just
 21 the sexual harassment policy?

22 **A. I don't remember.**

23 Q. Okay. Do you remember if there were --
 24 well, let me ask it this way: Do you remember any
 25 other Southwest flight attendants who were

Page 25

1 disciplined for a violation of Southwest's sexual
 2 harassment policy?

3 **A. I don't remember.**

4 Q. Now, do you remember investigating any
 5 reports of flight attendant conduct that were
 6 alleged to be a violation of one of those policies
 7 that did not result in discipline?

8 **A. I don't remember.**

9 Q. Okay. And how do you ordinarily hear
 10 about reported violations?

11 **A. Normally, flight attendants or other**
 12 **employees will turn something over to the company**
 13 **that they feel is offensive or disturbing in**
 14 **nature.**

15 Q. Apart from the employees turning it over,
 16 do you -- do you hear about, I guess, a potential
 17 violation in other ways?

18 **A. Sometimes a customer will make an**
 19 **allegation.**

20 Q. Okay. Apart from customers and other
 21 flight attendants, do you hear about a --
 22 complaints about a potential violation through
 23 other means?

24 **A. Not that I can recall; that's the typical**
 25 **-- that I know about it. It's the most common way,**

Page 26

1 Ralph Garrett's violation?

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 4 he engaged in that violated the rule?

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 6 **made inappropriate remarks to them and our**
 7 **customers.**

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 16 **inappropriate. Like, he was humming it and singing**
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 20 violations of any other policies as well or just
 21 the sexual harassment policy?

22 **A. I don't remember.**

23 Q. Okay. Do you remember if there were --
 24 well, let me ask it this way: Do you remember any
 25 other Southwest flight attendants who were

Page 26

1 **would be through a flight attendant or a customer.**

2 Q. Okay.

3 **A. Off the top of my head, maybe other**
 4 **avenues.**

5 Q. Okay. Do you remember any instances where
 6 maybe someone in Southwest management discovered
 7 some activity that they may have believed was a
 8 violation?

9 **A. I can't recall anything like that.**

10 Q. Do you know if Southwest monitors any
 11 social media activities?

12 **A. We do not monitor their activity.**

13 Q. Okay. Now, do you -- were there any
 14 instances while you were working at the Denver base
 15 where a flight attendant complained of religious
 16 discrimination?

17 **A. Religious discrimination? I don't recall.**

18 Q. Okay. And do you -- are you familiar with
 19 the idea of what a religious accommodation request
 20 is?

21 **A. Yes.**

22 Q. And do you know of any instances where a
 23 Denver-based flight attendant made a religious
 24 accommodation request?

25 **A. Not an actual request, no.**

Page 27

Page 27

Page 29

1 Q. Okay. And you say not an actual request.
 2 Do you recall any -- any instance where a flight
 3 attendant -- flight attendant's conduct may have
 4 involved an accommodation request in some way?

A. I don't understand your question.

Q. Do you remember any incidents involving
 flight attendants that involved religious
 incompetent -- accommodation in some way?

**A. I have never had a flight attendant put in
 a request that I know of for religious
 accommodation.**

Q. Okay. Is there a particular department at
 Southwest that handles religious accommodation
 requests?

A. Yes.

Q. And what is the name of that department?

A. They are referred to as the ACT team.

Q. Okay. And has the ACT team ever contacted
 the Denver base about a religious accommodation
 request?

MR. CORRELL: Objection. Calls for
 speculation.

A. I don't know.

Q. (By Mr. Gilliam) Okay. Now, in working
 in other areas at Southwest, are -- are you

Page 30

1 familiar with any case where any flight attendant
 2 made a religious accommodation request?

A. No.

Q. Okay. And in working at Southwest, have
 you ever been contacted by the ACT team about any
 flight attendant?

A. About any flight attendant, yes.

Q. Okay. And what -- what did the ACT team
 -- so in that instance, what -- what communications
 did you have with the ACT team?

**A. They had contacted me to inquire about
 uniform standards and feasibility of, like, wearing
 a brace with the uniform and clarification on job
 duties to -- to under -- so they could better
 understand the accommodation that was being asked.**

Q. Okay. So a flight had -- had a flight
 attendant -- do you know if a flight attendant had
 contacted them directly about a request for a
 religious accommodation involving their uniforms?

A. I don't know.

Q. Okay. So what -- I -- I guess, what --
 what was the specific request they were asking you
 to -- to evaluate involving the uniform and the
 brace?

A. If a flight attendant could wear a brace

1 **on their wrist that was flesh colored that would be
 2 visible to customers.**

Q. Okay. What -- what kind of brace?

A. Like a carpal tunnel brace.

Q. Okay. And was your understanding that it
 was a -- maybe a -- some sort of disability
 accommodation request?

**A. I don't recall specifically what it was
 falling under when they called to ask me that
 question.**

Q. Okay. Apart from that instance, were you
 ever contacted by the ACT team about some sort of
 accommodation issue?

A. I don't remember.

Q. Okay. You don't remember if you were
 contacted another time?

A. Correct. I don't remember.

Q. Okay. And I don't think I quite asked it
 this way, but were you in -- in your work at other
 locations in Southwest's system, did you ever hear
 of a flight attendant who had a religious
 discrimination complaint?

A. No, not that I am aware of.

Q. Okay. Do -- were you aware, during your
 work at the Denver base, of the -- the number of

Page 31

1 religious accommodation requests that Southwest
 2 received each year?

A. No.

Q. Okay. Okay. All right. When did you
 first learn that a flight attendant had reported
 Ms. Carter for her Facebook posts and messages?

A. I don't recall when that was.

Q. Okay. If I could -- do you recall
 receiving a complaint about Ms. Carter's Facebook
 posts and messages?

A. No, I didn't receive a complaint about it.

Q. Okay. Who did?

A. I don't know who received that complaint.

Q. Okay. But you are aware of a complaint?

A. Yes, I am.

Q. Okay. And who made that complaint?

A. It was Audrey Stone.

Q. Okay. And at the time the complaint was
 made, did you know who Audrey Stone was?

A. Yes.

Q. Okay. And how did you know Audrey Stone?

A. She was the president of the union.

Q. Okay. And how did you know that she was
 union president?

A. The union puts that information out.

Page 33

Page 35

1 Q. Okay. Do you know where the union puts
2 that information out?

3 **A. No, I don't know all of their -- their
4 avenues.**

5 Q. Okay. Do you know where the union puts
6 that information out that it would have been
7 communicated to you?

8 **A. No, I don't know where they would put that
9 out for that --**

10 Q. Had you -- did you have any conversations
11 with Audrey Stone in the past?

12 **A. I don't recall ever talking to her. I
13 don't know if I did or not.**

14 Q. Did you ever have any, I guess,
15 communications with the union prior to the
16 complaint against Ms. Carter?

17 **A. Yes.**

18 Q. Okay. And what sorts of communications
19 did you have with the union?

20 **A. I would communicate with the -- the local
21 DEBM, as they call it, and the local shop stewards
22 and the individuals who would answer the phone at
23 the Dallas office to schedule meetings and render
24 outcomes.**

25 Q. Okay. And what's -- what's a DEBM?

1 **you know, updates about base events. And if she
2 was representing a flight attendant, we would have
3 discussion in the fact-finding meeting about, you
4 know, that case.**

5 Q. Okay. What cases do you remember talking
6 to Ms. Parker about?

7 **A. I don't remember which cases we worked
8 together on.**

9 Q. Do you remember any details of any cases
10 you worked together on?

11 **A. I don't.**

12 Q. Okay. And, I guess, did you also work
13 with Chris Sullivan on cases?

14 **A. I recall working with him on cases, yes.**

15 Q. Okay. And what types of cases did you
16 work with Chris Sullivan on?

17 **A. Charlene's case.**

18 Q. Okay. Did you work with Chris Sullivan on
19 any other flight attendants' cases?

20 **A. I don't remember.**

21 Q. Okay. And prior to working with Chris on
22 Charlene's case, what sorts of communications did
23 you have with Chris?

24 **A. Very limited. I would say hello to him
25 when he came into the base. He used to be the**

Page 34

Page 36

1 **A. It's a -- I don't know the entire acronym,
2 but it's an executive board member --**

3 Q. Okay.

4 **A. -- in a local domicile.**

5 Q. Okay. Who were the DEBMs you had -- who
6 you had communicated with in the past?

7 **A. Jessica Parker and Chris Sullivan.**

8 Q. Okay. Had you -- while working in Denver,
9 had you communicated with any other DEBMs?

10 **A. I don't know. There is only one per base,
11 one --**

12 Q. Okay.

13 **A. -- DEBM per base.**

14 Q. Okay. At Phoenix, did you work with any
15 DEBMs?

16 **A. Yes.**

17 Q. And which DEBMs did you work with there?

18 **A. Just one. John DiPippa.**

19 Q. Okay. And while at Denver, who were the
20 shop stewards you communicated with?

21 **A. I don't remember who they were.**

22 Q. Okay. And what -- what sorts of
23 communications did you have with Jessica Parker?

24 **A. Those communications were limited to just
25 ongoings (sic) at the base, like base happenings;**

1 **DEBM, so he used to be in the base more often, but
2 I don't recall what types of communication or --
3 you know, specifics of that.**

4 Q. Okay. Was he the DEBM when you first
5 started working at the Denver base?

6 **A. Yes.**

7 Q. Okay. All right. And how did you get
8 involved in the investigation involving
9 Ms. Carter's Facebook posts and messages?

10 **A. I don't recall exactly how I got involved
11 in it.**

12 Q. What do you recall about your involvement
13 in it?

14 **A. I recall working with Ed on it. I recall
15 him saying that we had this investigation, but I
16 don't recall exactly how I was selected to work
17 with him on it.**

18 Q. Okay. If I could direct your attention to
19 Document 4. This is Exhibit 2. I will give you a
20 specific page number. Page 4436. It's towards the
21 front.

22 **A. Hang on. Document 4?**

23 Q. Yeah. Document 4.

24 **A. Okay.**

25 Q. And Exhibit 2 if anybody is following the

Page 37

Page 39

1 exhibit numbers. And it's --

2 MR. CORRELL: Counsel, I think that
3 may be inverted. I think it's Document 2, but
4 Exhibit 4.

5 MR. GILLIAM: I am sorry. Yes. It's
6 Exhibit 4, Document 2. So Exhibit 4.

7 **A. By Document 2, do you mean Page 2 of --**

8 MR. CORRELL: One second, Ms. Jones.
9 Let me see how -- I believe we sent them to you by
10 document number, not by exhibit number, so let me
11 just confirm that. Yes, we did. So it's the --
12 the document you will open will be the one labeled
13 2docs.PDF in the email from Ms. Armstrong.

14 THE WITNESS: Okay. Thank you.

15 Q. (By Mr. Gilliam) And then if you will
16 look for the -- the Bates-numbered page, it's the
17 -- there is a number that says SWA00 followed by
18 numbers at the bottom right-hand corner. If you
19 look for the SWA004436. Again, it's maybe the
20 fourth document.

21 **A. Okay.**

22 Q. Fourth page. And if you could just take a
23 look at it and review it once you have had a chance
24 to look at it.

25 **A. Confirming it's SWA004436?**

1 Did I screw this up?

2 **A. Which one is Document 1?**

3 Q. I'm sorry. You know what, I screwed this
4 up again. I think Mike may not have sent it to you
5 because I was thinking that this was Document 3,
6 but I -- I had the exhibits and document numbers
7 inverted.

8 MR. CORRELL: Let me check real quick.

9 MR. GILLIAM: Because this was not one
10 of the numbers I gave you.

11 MR. CORRELL: Well, no, it is Exhibit
12 3. You said Exhibits 2 through 7. So,
13 Ms. Jones --

14 MR. GILLIAM: Okay.

15 MR. CORRELL: -- it will be the
16 document labeled 1docs.PDF on the email that you
17 received from Ms. Armstrong at 11:34 p.m.
18 yesterday.

19 THE WITNESS: Okay.

20 **A. I believe I have it here.**

21 Q. (By Mr. Gilliam) Okay. And once you find
22 it and get it open, take a -- take a look at it.

23 **A. Can you confirm the SWA number on the
24 bottom? I just want to make sure I have got the
25 right one.**

Page 38

Page 40

1 Q. Yes, ma'am. Yeah.

2 **A. Thank you. Okay.**

3 Q. Do you recognize this?

4 **A. Not really.**

5 Q. Well, I guess, at the top, it -- it says,
6 from Dave Kissman and it's dated Thursday, February
7 23rd, 2017. And you are -- you are one of the
8 recipients, correct?

9 **A. Yes.**

10 Q. Okay. And can you -- can you tell what it
11 is?

12 **A. It's an email, and I was copied in on it,
13 but I don't -- I don't know that I recognize the --
14 the email.**

15 Q. Okay. And are you familiar with the --
16 some of the paragraphs towards the bottom of the
17 email?

18 **A. Familiar in -- in what regard?**

19 Q. Do -- does that help refresh your -- your
20 memory of --

21 **A. Yes.**

22 Q. -- investigation?

23 **A. Yes.**

24 Q. Okay. All right. And let's see. Next,
25 if I could direct your attention to Document 1.

1 Q. Yeah. No, no. Sure. It's 4226.

2 **A. Okay. Got it. Thank you. Okay.**

3 Q. Do you recognize this?

4 **A. I don't.**

5 Q. Okay. Do you know if you've -- you've
6 seen this email before?

7 **A. I don't know. I don't remember if I have
8 seen it before or not.**

9 Q. Okay. And did you also -- let's see. Did
10 you also take a look at the other pages that are
11 part of this document?

12 **A. This -- the part that carries into the
13 second page, 4227?**

14 Q. Yeah. All the way -- yeah. I guess, if
15 you could review the whole document, all of
16 Document 1, including the -- I guess, all the way
17 to -- well, they are not sequential, but it's -- I
18 think 4233 is the last page.

19 **A. Okay.**

20 Q. All right. And have -- the -- some of the
21 pages that follow are screenshots, correct?

22 **A. Correct.**

23 Q. Okay. And have you seen those screenshots
24 before?

25 **A. Yes, I have.**

Page 41

Page 43

1 Q. Okay. And where did you see those?
 2 **A. In Charlene's meeting.**
 3 Q. Okay. Which -- which meeting was that?
 4 **A. She had a fact-finding meeting.**
 5 Q. Okay. All right. And I guess you've --
 6 so -- well, let me -- let me look here.
 7 So do you know when Charlene's
 8 fact-finding meeting was?
 9 **A. I don't remember when it was.**
 10 Q. Okay. Turning back to the other document,
 11 Document 2. And the page we were looking at there.
 12 **A. One moment, please. I don't recall which
 one that was in.**
 13 Q. It's Document 2 and it was 4436.
 14 **A. One moment, please. 4436?**
 15 Q. Yeah.
 16 **A. Just a moment, please. Okay. Got it.**
 17 Q. Now, in this email, Dave Kissman sends it
 18 to Ed Schneider, you, Hector Barrera, and Dustin
 19 Moore and attaches some images -- or there's some
 20 images attached. Do you know if the -- the images
 21 in Document 1 you looked at were attached to this
 22 email?
 23 **A. I don't remember.**
 24 Q. Okay. And Dave Kissman says, Ed, give

1 Hudson and Sonya Lacore.
 2 **A. Yes.**
 3 Q. Do you know who Suzanne Stephensen is?
 4 **A. Yes.**
 5 Q. And who is she?
 6 **A. At the time, she was the Las Vegas base
 manager.**
 7 Q. Okay. Did you --
 8 MR. GREENFIELD: Matthew?
 9 MR. GILLIAM: Yes.
 10 MR. GREENFIELD: Matthew, I am so
 11 sorry to interrupt. When you get to a stopping
 12 place, if we could just take a very quick
 13 five-minute break. I have a personal emergency
 14 situation I have to tend to.
 15 MR. GILLIAM: Yeah, sure. Let's -- if
 16 everybody else is okay, we can take a five-minute
 17 break now.
 18 THE WITNESS: Yes.
 19 MR. CORRELL: Very good.
 20 THE WITNESS: That would be great.
 21 Thank you.
 22 THE VIDEOGRAPHER: We are off record
 23 at 10:10 a.m.
 24 (Recess taken.)

Page 42

Page 44

1 Suzanne a call.
 2 **A. Yes, he does.**
 3 Q. Okay. And as part of this email chain,
 4 the -- the email below it is from Audrey
 5 Stone to Suzanne Stephensen?
 6 **A. Yes.**
 7 Q. Okay. And, I guess, do you see, as part
 8 of this chain, the -- the -- the bottom part of
 9 this chain on 4436 is the same email as Document 1;
 10 does that seem correct to you?
 11 MR. CORRELL: Objection. The document
 12 speaks for itself.
 13 Q. (By Mr. Gilliam) You can answer, though.
 14 **A. It -- it looks like part of it, but it
 doesn't look like it's all in there.**
 15 Q. Okay. But it -- it looks like at least
 16 that part of the email was forwarded to you, right?
 17 **A. Yes.**
 18 Q. Okay. And do you know if Dave Kissman was
 19 asking Ed to begin his investigation into the
 20 Facebook post?
 21 **A. It's -- it look like he was asking him to.**
 22 Q. Okay. And -- and I am sorry. The -- the
 23 -- the email in the chain below is from Audrey
 24 Stone to Suzanne Stephensen and it CC's Naomi

1 THE VIDEOGRAPHER: We are back on
 2 record at 10:28 a.m.
 3 Q. (By Mr. Gilliam) All right. Ms. Jones,
 4 if I could direct you back to Document 4436, I
 5 think that's where we left off before the break.
 6 It's part of Document 2.
 7 **A. Yes.**
 8 Q. Okay. And I -- I may have just asked you
 9 if you knew Suzanne Stephensen. And did -- do you
 10 know who Suzanne Stephensen is?
 11 **A. Yes.**
 12 Q. Okay. And how do you know Suzanne
 13 Stephensen?
 14 **A. She was the base manager in Las Vegas.**
 15 Q. Okay. Is she still the base manager in
 16 Las Vegas?
 17 **A. No.**
 18 Q. Does Suzanne Stephensen work with
 19 Southwest?
 20 **A. No.**
 21 Q. Okay. And had you had any communications
 22 with Suzanne Stephensen before you were sent this
 23 email by Davis Kissman?
 24 **A. No.**
 25 Q. Okay. Now, here, Dave Kissman's email

Page 45

1 says, Ed, give Suzanne a call.
 2 Do you know if Ed Schneider
 3 communicated with Suzanne Stephensen about Carter's
 4 Facebook post?
 5 **A. I don't know.**
 6 Q. Okay. But you -- you do know that Ed
 7 started conducting an investigation into Charlene
 8 Carter's Facebook post, right?
 9 **A. Yes.**
 10 Q. Okay. Now, after receiving this email, do
 11 you know if -- well, let me back up.
 12 During the investigation, did you ever
 13 have any communications with Suzanne about the
 14 Facebook post?
 15 **A. I don't recall.**
 16 Q. Okay. What -- what communications do you
 17 recall during the investigation?
 18 **A. Can you be more specific?**
 19 Q. Sure. Sure. So after -- after Ed started
 20 his investigation, do you remember Ed asking you
 21 to participate in the investigation?
 22 **A. I don't remember if he asked me to**
 23 **participate. I don't remember the -- a specific**
 24 **conversation that took place.**
 25 Q. How did you come to be involved in the

Page 46

1 investigation?
 2 **A. It's possible that he did ask me to help**
 3 **him with it. I just -- I don't remember exactly.**
 4 Q. Do you remember any other details about
 5 how you came to be involved in the investigation?
 6 **A. No.**
 7 Q. Okay. Do you know if you talked to
 8 Ms. Stone as part of the investigation?
 9 **A. No.**
 10 Q. No, you don't remember; or, no, you
 11 didn't?
 12 **A. No, I didn't.**
 13 Q. Okay. Do you know who corresponded with
 14 Ms. Stone as part of the investigation?
 15 **A. I don't, no.**
 16 Q. Okay. But you do recall participating in
 17 Charlene Carter's fact-finding?
 18 **A. Yes.**
 19 Q. Okay. Do you know if, prior to Charlene
 20 Carter's fact-finding, whether any sort of
 21 information-gathering process had -- had started?
 22 **A. Yes.**
 23 Q. Okay. And what happened as part of the
 24 investigation -- as part of the
 25 information-gathering process?

Page 47

1 **A. I was asked to look at her Facebook page.**
 2 Q. Okay. I am sorry. You said you were
 3 asked to do what with her Facebook page?
 4 **A. To look at her Facebook page.**
 5 Q. Okay. Who asked you to look at her
 6 Facebook page?
 7 **A. Ed Schneider.**
 8 Q. Okay. And what did Ed -- Ed Schneider ask
 9 you to look for on her Facebook page?
 10 **A. I don't recall specifically.**
 11 Q. So what do you recall about looking at
 12 Ms. Carter Facebook page?
 13 **A. I remember looking at it. I don't recall**
 14 **much else.**
 15 Q. Okay. Do you recall taking any
 16 information back from her page to Mr. Schneider?
 17 **A. I don't recall.**
 18 Q. Okay. Okay. Do you -- now, the -- the
 19 Facebook posts that were attached to the email I
 20 sent you earlier -- or I am sorry -- that -- that
 21 were attached to the email you reviewed earlier as
 22 part of -- which one was it? -- Document 1, do you
 23 recall if you saw any of those images from the
 24 screenshots on Ms. Carter's Facebook page?
 25 **A. I don't recall.**

Page 48

1 Q. Okay. But you recall those being
 2 Charlene's Facebook posts at issue in this case?
 3 **A. I'm sorry, can you repeat --**
 4 MR. CLOUTMAN: Objection. Misstates
 5 prior testimony.
 6 Q. (By Mr. Gilliam) Do you -- do you recall
 7 those images being the -- some of the images you
 8 were investigating and looking at as part of this
 9 investigation?
 10 **A. Yes.**
 11 Q. Okay. Now, did you talk to either of the
 12 other two assistant base managers about those
 13 posts?
 14 **A. I don't recall.**
 15 Q. Okay. Do you know if you talked to Dave
 16 Kissman about those posts?
 17 **A. I don't recall.**
 18 Q. Do you recall if you communicated with
 19 them in any way about the investigation?
 20 **A. No, I don't recall.**
 21 Q. Okay. All right. Let's see if I can
 22 refer you to the same document, Document 2. It
 23 should be 4450.
 24 **A. 4450?**
 25 Q. Yes.

Page 49

1 **A. Okay.**
 2 Q. If you could just take a look at this.
 3 And when you have had the chance to review it, let
 4 me know.
 5 **A. Okay.**
 6 Q. Do you know what this is?
 7 **A. It's an email.**
 8 Q. Okay.
 9 **A. From -- from Ed.**
 10 Q. And it's to employee relations DG; do you
 11 know who that is?
 12 **A. Yes, I do.**
 13 Q. Who is that?
 14 **A. It's the team that investigates any**
 15 **potential Title 7 issue.**
 16 Q. A team that invests (sic) Title 7 issues?
 17 **A. Like, harassment, you know, anything like**
 18 **that. Harassment policy, things like that.**
 19 Q. Okay. And is that what the employee
 20 relations group does?
 21 **A. Yes.**
 22 Q. Okay. And who are the, I guess, members
 23 of that employee relations team who would receive
 24 that email?
 25 **A. I don't know who is on that team.**

Page 50

1 Q. Okay. Did you -- do you know who was on
 2 that team in 2017?
 3 **A. Not entirely.**
 4 Q. Okay. Who do you remember being on that
 5 team?
 6 **A. Christine Johnson.**
 7 Q. Okay. Who else?
 8 **A. Denise Gutierrez.**
 9 Q. And who else?
 10 **A. That's all I know.**
 11 Q. All right. Do you know if either
 12 Christine Johnson or Denise Gutierrez was involved
 13 in this investigation?
 14 **A. Yes.**
 15 Q. Okay. And which of them was involved in
 16 this investigation?
 17 **A. Denise Gutierrez.**
 18 Q. Okay. Was Christine Johnson involved in
 19 the investigation?
 20 **A. I don't recall if she was or not.**
 21 Q. Okay. But Denise Gutierrez was?
 22 **A. Yes.**
 23 Q. Okay. Do you know why Ed contacted
 24 employee relations about this matter?
 25 **A. Yes.**

Page 51

1 Q. Okay. And why was that?
 2 **A. Because the nature of the allegation being**
 3 **made.**
 4 Q. And what about the nature of the
 5 allegation made it something that he would send to
 6 employee relations?
 7 **A. Any time an allegation might fringe on a**
 8 **protected category, we run it past employee**
 9 **relations.**
 10 Q. Okay. And do you know what the allegation
 11 here that might have infringed on a protected
 12 category was?
 13 **A. I would have to go back and read again to**
 14 **be able to determine exactly what that -- that**
 15 **would be.**
 16 Q. What would you have to go back and read?
 17 **A. The statement from Audrey.**
 18 Q. Yeah. If you could, go back and look at
 19 Document 1.
 20 **A. Can you confirm the number on that one,**
 21 **the SWA number?**
 22 Q. Yeah. It's the whole thing -- the whole
 23 thing.
 24 **A. Is it 4226?**
 25 Q. 4226, yes. The first page.

Page 52

1 **A. Thank you. Just want to make sure I am on**
 2 **the right page. Okay.**
 3 Q. All right. So -- so what about the
 4 allegation in the complaint involved the need to
 5 consider protected categories?
 6 **A. She uses the term "harassment" in her**
 7 **complaint, and so that would be an indication it**
 8 **would need to be run past the employee relations**
 9 **team. And she also makes statements about her**
 10 **religious views, which would also be an indication**
 11 **it would need to be run past that team.**
 12 Q. Okay. What's the statement about
 13 religious views you're referring to?
 14 **A. Charlene doesn't know me or my religious**
 15 **views.**
 16 Q. Okay. And let's see. And Ed -- now, in
 17 other issues you dealt with involving potential
 18 violations of the harassment policy, was it routine
 19 to turn in to employee relations any complaint that
 20 used the term "harassment"?

21 **A. Yes.**
 22 Q. Okay. So for every single one that used
 23 the term "harassment," you would send it to
 24 employee relations?
 25 MR. CORRELL: Objection. Misstates

Page 53

1 prior testimony.
 2 Q. (By Mr. Gilliam) You can answer.
 3 A. That's a kind of complicated question
 4 because it would depend on the nature of that
 5 complaint. And, you know, typically, if they use
 6 the term "harassment," it's sent to that group.
 7 Q. Okay. What other, I guess,
 8 characteristics involved in the nature of the
 9 complaint would factor into the decision as to
 10 whether to send it to employee relations?
 11 A. If it appeared to fringe on a protected
 12 category, it would be sent to employee relations.
 13 Q. Okay. And did Audrey's complaint present
 14 an issue that appeared to infringe on a protected
 15 category?
 16 A. Yes.
 17 Q. Okay. And how so?
 18 A. The language that she used in the
 19 complaint.
 20 Q. What -- so I am assuming other language
 21 besides harassment, correct --
 22 A. In --
 23 Q. -- is that what we are talking about?
 24 A. In her case, she did use the term
 25 "harassment." And her reference to her religious

Page 55

1 them. And it looks like they hit reply all.
 2 Q. Okay. Do you know why Ed CC'd you in --
 3 A. I --
 4 Q. -- to his original email?
 5 A. I was assisting him with the
 6 investigation.
 7 Q. Okay. And after receiving this email --
 8 well, let me direct your attention to something
 9 real quick. In the email that Denise sends, she
 10 says, please set up a call with Audrey Stone so
 11 that we can get more information about her
 12 concerns.
 13 Do you know if Ed set up a call with
 14 Audrey Stone after receiving this email?
 15 A. I don't know.
 16 Q. Okay. And -- but you do know that a
 17 fact-finding with Charlene was set up?
 18 A. Yes.
 19 Q. Okay. Did Charlene have union
 20 representation at that fact-finding?
 21 A. Yes.
 22 Q. And who was her union representative?
 23 A. Chris Sullivan.
 24 Q. Okay. And prior to the fact-finding, did
 25 you talk to Chris Sullivan at all?

Page 54

1 views.
 2 Q. Okay. Okay. Now, after Ed sent this
 3 email, do you know if you had additional
 4 communications with employee relations?
 5 A. No, I don't know.
 6 Q. Okay. Okay. If you could look at
 7 Document 2, and it's Number 4459.
 8 A. 4459?
 9 Q. Yes.
 10 A. Okay. I have got it here.
 11 Q. And if you could just read over it. Once
 12 you have read it, let me know.
 13 A. Okay.
 14 Q. Do you recognize this?
 15 A. It's -- I don't recognize it.
 16 Q. Do you know what it is?
 17 A. Yes.
 18 Q. What is it?
 19 A. It's an email from Denise Gutierrez to Ed
 20 and the employee relations group.
 21 Q. And you are included on the email too,
 22 correct?
 23 A. Yes. I am CC'd in on the email.
 24 Q. Okay. Do you know why you were CC'd in?
 25 A. Ed CC'd me in on his communication to

Page 56

1 A. I don't recall.
 2 Q. Okay. Did you trade emails with him at
 3 all?
 4 A. I don't believe so.
 5 Q. Okay. All right. Prior to the
 6 fact-finding, do you know if you had communications
 7 with anyone from any other Southwest department
 8 regarding the investigation?
 9 A. I don't recall.
 10 Q. Okay. Do you know if you talked to
 11 Maureen Emlet?
 12 A. I don't recall.
 13 Q. Okay. Do you know if Maureen Emlet was
 14 involved in the investigation?
 15 A. I don't know.
 16 Q. Okay. Do you know if Edie Barnett was
 17 involved in the investigation?
 18 A. Yes.
 19 Q. Okay. And how do you know that?
 20 A. The work group that she is in oversaw the
 21 bullying policy.
 22 Q. Okay. How do you know that Edie Barnett
 23 specifically was involved in the investigation?
 24 A. She was the only member of that team that
 25 supported our base.

Page 57

1 Q. Okay. Now, who from the Denver base, if
 2 anybody, communicated with Edie Barnett?
 3 **A. I don't know.**
 4 Q. Okay. Did you have any communications
 5 with Edie Barnett?
 6 **A. No.**
 7 Q. Okay. All right. Prior to having the
 8 fact-finding with Charlene, did you have any
 9 conversations with Ed about setting up the
 10 fact-finding with Charlene?
 11 **A. I don't recall.**
 12 Q. Okay. Do you recall who set up the
 13 fact-finding with Charlene?
 14 **A. I don't recall.**
 15 Q. All right. During the investigation and
 16 prior to the fact-finding, do you remember if
 17 Audrey Stone -- well, let me back up.
 18 During the investigation and prior to
 19 the fact-finding, do you remember if you had seen
 20 any other posts or messages that Charlene had sent
 21 Audrey Stone -- had you received those?
 22 **A. I didn't personally receive them.**
 23 Q. Okay. Who did?
 24 **A. I believe Ed did.**
 25 Q. Okay. Did Ed send them to you?

Page 58

1 **A. No.**
 2 Q. Okay. How do you know Ed received them?
 3 **A. He showed them to me.**
 4 Q. Okay. He showed them to you before the
 5 fact-finding?
 6 **A. Yes.**
 7 Q. Okay. And what did he show to you?
 8 **A. He showed me the screenshots of some**
 9 **messages and some postings.**
 10 Q. Okay. And what were the messages and
 11 postings he showed you?
 12 **A. I don't recall the specifics of them, but**
 13 **they were between Audrey and Charlene.**
 14 Q. Okay. What do you recall about the
 15 messages and postings?
 16 **A. There was a lot of them and some of them**
 17 **were very graphic.**
 18 Q. When you say very graphic, what do you
 19 mean?
 20 **A. There were images that were graphic of a**
 21 **aborted fetus.**
 22 Q. Okay.
 23 **A. Some of them.**
 24 Q. And what were some of the others?
 25 **A. Messages from Charlene to Audrey.**

Page 59

1 Q. Okay. What did the messages say?
 2 **A. I don't recall.**
 3 Q. Okay. All you recall is that they were
 4 messages?
 5 **A. Yes.**
 6 Q. Okay. And did Ed show these to you in --
 7 in the office?
 8 **A. Yes.**
 9 Q. Okay. And what did you discuss about the
 10 messages and posts?
 11 **A. He wanted me to be aware of what the**
 12 **meeting was about, since I was going to be taking**
 13 **notes for him. And he wanted me to be prepared for**
 14 **some of the images because they were graphic.**
 15 Q. Okay. He wanted you to be prepared?
 16 **A. Yes.**
 17 Q. Now, you had seen them before, correct?
 18 **A. I don't recall when I first saw the**
 19 **images.**
 20 Q. Okay. And he -- he said he wanted you to
 21 be aware of what the meeting was about. As part of
 22 that, did he inform you what it was about?
 23 **A. Yes.**
 24 Q. And what did he tell you it was about?
 25 **A. Social media posts that had occurred that**

Page 60

1 **was reported by another flight attendant.**
 2 Q. And what else did he tell you about what
 3 the meeting dealt with?
 4 **A. I don't remember.**
 5 Q. Okay. Were you and Ed the only two in
 6 that meeting?
 7 **A. As far as -- what do you mean?**
 8 Q. Were you and Ed the only two in that
 9 meeting you had where he informed you what the --
 10 the fact-finding would be about?
 11 **A. Yes.**
 12 Q. Okay. Do you know if that was your first
 13 conversation with Ed Schneider about what -- I
 14 guess, about the Facebook messages and posts?
 15 **A. I don't recall.**
 16 Q. Okay. I would like to take you back to
 17 Document 1 again.
 18 **A. Okay.**
 19 Q. And if you could focus on 4228.
 20 **A. You said this was Document 1?**
 21 Q. Document 1, yeah.
 22 **A. Okay.**
 23 Q. And this -- this post mentions that the
 24 recall is going to happen. What is the recall?
 25 **A. The recall was -- effort to recall the**

Page 61

1 union officials that were holding office at that
 2 time.
 3 Q. Okay. What does that mean?
 4 A. Just -- it means that flight attendant
 5 union members -- some of the members had started a
 6 petition to recall the current elected officials.
 7 Q. Okay. Do you know which members started
 8 the petition?
 9 A. No.
 10 Q. Okay. When did you first learn about the
 11 recall?
 12 A. I don't know.
 13 Q. Where did you hear about it?
 14 A. At work.
 15 Q. Who talked about it at work?
 16 A. I don't remember.
 17 Q. Did Jessica Parker talk to you about the
 18 recall?
 19 A. No.
 20 Q. Okay. Did you ever talk to Jessica Parker
 21 about the investigation into the Facebook posts?
 22 A. No.
 23 Q. Okay. Did you ever communicate with
 24 Jessica Parker about any aspect of the
 25 investigation into Carter's Facebook post?

Page 62

1 A. No.
 2 Q. Okay. And do you know if the recall was
 3 successful?
 4 A. I -- I don't know if it was or not.
 5 Q. Okay. Do you know if any -- so as for the
 6 recall, would -- you mentioned that it was a
 7 petition to -- I think you mentioned that it was a
 8 petition, more or less, to remove union officers;
 9 is that right?
 10 A. Yes.
 11 Q. Okay. And would that have been to remove
 12 Audrey Stone as well?
 13 A. Yes.
 14 Q. Okay. Do you know if Audrey Stone was
 15 removed from the executive board?
 16 A. I don't know.
 17 Q. Okay. Do you know when that recall
 18 petition began?
 19 A. No.
 20 Q. Okay. Let's see. If I could direct you
 21 to -- let's see here. I am jumbled up. There we
 22 go. Document 9. And 4675 is the first page
 23 number.
 24 A. I don't know that I have Document 9.
 25 Okay. I -- maybe I do in a different email. Hang

1 on. Here we go. Okay. Let's see. Okay.
 2 Document 9. And what was the page number?
 3 Q. 4675.
 4 A. Yes. Okay.
 5 Q. And if you could take a look at that.
 6 A. Okay.
 7 Q. And not just 4675, but all of the attached
 8 pages as well.
 9 A. Okay.
 10 Q. Do you recognize this?
 11 A. Yes, I do.
 12 Q. And what is it?
 13 A. It's an email from Ed to Maureen Emlet and
 14 Denise Gutierrez.
 15 Q. Okay. And you are CC'd, correct?
 16 A. Yes.
 17 Q. Okay. Now, what -- do you recognize the
 18 pages behind that first page?
 19 A. Yes.
 20 Q. Okay. And what are those pages?
 21 A. Those are the fact-finding notes.
 22 Q. Okay. And did you draft those notes?
 23 A. Yes.
 24 Q. Okay. Now, who attended that fact-finding
 25 meeting?

Page 64

1 A. Charlene Carter, Chris Sullivan, myself,
 2 Ed Schneider, Denise Gutierrez and Edie Barnett.
 3 But Denise and Edie were conferenced in via phone.
 4 Q. Okay. And was there anyone else there?
 5 A. No.
 6 Q. Okay. And I would like to direct you to
 7 4679.
 8 A. Okay.
 9 Q. And midway down, Ed says, we did go
 10 through it a little bit and there are some here --
 11 I guess the sentence before that, sentence is talk
 12 -- talk before that about -- well, Ed says, when
 13 you are posting on your Facebook page, are you
 14 aware of other posts on there that would connect
 15 you to Southwest Airlines? Possibly pictures of
 16 you in your uniform?
 17 And then it goes on and Ed says, we
 18 did go through a little bit and there are some
 19 here; shows pictures of Charlene at work in her
 20 uniform.
 21 Do -- do you know who obtained those
 22 pictures?
 23 MR. CORRELL: Objection.
 24 Mischaracterizes the document. You can answer,
 25 Ms. Jones.

Page 65

1 **A. I did.**
 2 Q. (By Mr. Gilliam) Okay. And when did you
 3 obtain those pictures?
 4 **A. I don't remember when.**
 5 Q. Where did you obtain those pictures from?
 6 **A. Charlene's Facebook page.**
 7 Q. Okay. And do you remember the dates of
 8 those pictures?
 9 **A. I don't.**
 10 Q. Okay. And let's see if I can direct you
 11 to 4680.
 12 **A. Okay.**
 13 Q. It says -- let see. Midway down -- about
 14 midway down, there is a comment from Ed that says,
 15 with your Facebook post, there is a connection to
 16 the workplace and you can't have your political
 17 views with Southwest as part of your depiction
 18 there.
 19 Do you know if Southwest has ever
 20 fired another employee for posting their political
 21 views on social media?
 22 **A. Yes.**
 23 Q. Okay. And what happened in that case?
 24 **A. The employee posted political views that
 25 were offensive to other individuals, and they were**

Page 66

1 **-- an investigation ensued and they were
 2 terminated.**
 3 Q. Okay. And what were the -- those
 4 political posts?
 5 **A. They were in relation to the Black Lives
 6 Matter movement.**
 7 Q. Okay. What was name of the employee that
 8 posted the -- those posts?
 9 **A. Brandon Colson.**
 10 Q. Okay. Was that a flight attendant in the
 11 Denver region?
 12 **A. No.**
 13 Q. What -- what base was he operating out of?
 14 **A. Phoenix.**
 15 Q. Okay. Did you fire him?
 16 **A. No.**
 17 Q. Who terminated him?
 18 **A. One of the assistant managers at the
 19 Phoenix base.**
 20 Q. Okay. What was the name of the assistant
 21 manager at the Phoenix base?
 22 **A. I don't recall.**
 23 Q. Do you recall the names of any of the
 24 assistant managers at the Phoenix base?
 25 **A. Yes.**

Page 67

1 Q. Okay. What are their names?
 2 **A. Jim Day.**
 3 Q. Okay.
 4 **A. Ted Thornton.**
 5 Q. Okay.
 6 **A. And Heidi Patrick.**
 7 Q. Okay. Do you remember if there were any
 8 other assistant base managers?
 9 **A. In Phoenix?**
 10 Q. Yes.
 11 **A. Specific to when I worked there or --**
 12 Q. Well, so let me ask it this way: Did Jim
 13 Day terminate Brandon Colson?
 14 **A. I don't --**
 15 MR. CORRELL: Objection. Asked and
 16 answered.
 17 **A. I don't remember.**
 18 Q. (By Mr. Gilliam) Okay. Were these
 19 assistant base managers assistant base managers at
 20 the Phoenix location when Brandon was terminated?
 21 **A. Yes.**
 22 Q. Okay. So would it have been one of those
 23 three base managers who fired Brandon?
 24 **A. Yes.**
 25 Q. Do you know if one of the three you

Page 68

1 mentioned did not fire Brandon?
 2 **A. Yes.**
 3 Q. Okay. And which one is that?
 4 **A. Heidi Patrick.**
 5 Q. Okay. So by process of elimination,
 6 either Jim Day or Ted fired --
 7 **A. Yes --**
 8 Q. -- Brandon?
 9 **A. -- it was one of those two, yes.**
 10 Q. Okay. So what did Brandon post about
 11 Black Lives Matter?
 12 **A. I don't recall the specific content of the
 13 post.**
 14 Q. What do you -- I'm sorry?
 15 **A. I am sorry. There were several.**
 16 Q. Okay. There were several posts. What do
 17 you remember about the posts?
 18 **A. They were violent-sounding.**
 19 Q. What do you mean by they were
 20 violent-sounding?
 21 **A. The posts sounded hateful and violent;
 22 like, they sounded like he wanted to incite
 23 violence.**
 24 Q. He -- it sounded like he wanted to incite
 25 violence against who?

Page 69

Page 71

1 **A. Just against members of the Black Lives
2 Matter movement.**

3 Q. Okay. Did he have a -- well, let me back
4 up and ask it this way: Was there a nexus between
5 his post about Black Lives Matter and Southwest
6 Airlines?

7 **A. Yes.**

8 Q. And what was that nexus?

9 **A. Multiple pictures of him in flight
10 attendant -- his Southwest flight attendant
11 uniform.**

12 Q. Okay. Where -- were there other posts or
13 things on his -- on his page that had -- that made
14 a nexus or created a nexus with Southwest?

15 **A. I don't recall.**

16 Q. Okay. And were you -- were you involved
17 in the investigation of this matter?

18 **A. I was not involved in it, no.**

19 Q. Okay. Did you -- and I -- I asked if you
20 were involved in the investigation, but were you
21 involved in making the decision in any way?

22 **A. No, I was not.**

23 Q. Okay. How did you become aware of this
24 incident?

25 **A. It occurred while I was still the Phoenix**

1 **A. No.**

2 Q. Okay. But the assistant base managers in
3 Phoenix had the authority to investigate and then
4 terminate an employee all on their own?

5 **A. No.**

6 Q. Okay. So was the -- your successor the
7 one who made the decision?

8 MR. CORRELL: Objection. Calls for
9 speculation.

10 **A. I don't know who made the decision.**

11 Q. (By Mr. Gilliam) Okay. I guess what I am
12 trying to understand is if you were still the base
13 manager, but no assistant base manager could make
14 the decision to fire somebody without the base
15 manager's approval, how they were able to do that;
16 can you explain that to me?

17 MR. CORRELL: Objection. Misstates
18 prior testimony. It's an incomplete hypothetical.
19 You can answer if you are able, Ms. Jones.

20 **A. I was no longer the base manager when it
21 came time to make that decision. The investigation
22 is a process. So it wasn't me in that role.**

23 Q. (By Mr. Gilliam) Okay. But let's step
24 back a bit. So the -- the base -- the assistant
25 base manager would have had to obtain the base

Page 70

Page 72

1 **base manager.**

2 Q. Okay. So even as the Phoenix base
3 manager, you didn't have any role in the
4 investigation or decision to terminate Brandon?

5 **A. I did not.**

6 Q. Okay. And even as the Phoenix base
7 manager, you don't remember which assistant base
8 manager made the termination?

9 MR. CORRELL: Objection. Asked and
10 answered three times.

11 **A. Correct.**

12 Q. (By Mr. Gilliam) Okay. So your assistant
13 base managers in Phoenix could make the decision to
14 terminate Brandon without your knowledge?

15 **A. That's not necessarily true. I had -- I
16 had transitioned out of that role into my new role
17 by the time they made the decision.**

18 Q. Okay. Had they started the investigation
19 while you were there?

20 **A. Yes.**

21 Q. Okay. Did -- did the assistant base
22 manager involved consult with you in any way
23 about --

24 **A. No.**

25 Q. -- Brandon's termination?

1 manager's approval in order to fire a flight
2 attendant; is that correct?

3 **A. Correct.**

4 Q. Okay. So if there was no base manager at
5 the time, could the assistant base manager have
6 made that decision on his own?

7 **A. Can you rephrase your question?**

8 Q. Well, yeah. I am just trying to
9 understand how it happened, and I feel like you are
10 being evasive.

11 **A. I'm not trying --**

12 MR. CORRELL: Okay --

13 **A. -- to be evasive.**

14 MR. CORRELL: Hang on. Hang on.
15 She's told you she wasn't there; she was replaced
16 and she doesn't know. So what is she being evasive
17 about, Counsel?

18 MR. GILLIAM: Well, she's being
19 evasive about how a -- an assistant base manager
20 can terminate a flight attendant when --

21 MR. CORRELL: No, she's not, Counsel.
22 What she said was she wasn't there; someone else
23 came in. She doesn't have knowledge of how the
24 process ended.

25 MR. GILLIAM: Okay. But --

Page 73

1 MR. CORRELL: We're getting close to
 2 -- we're getting close to an objection of badgering
 3 and instructing her not to answer because she's
 4 told you multiple times she left during the
 5 investigation; a new person came in. She has no
 6 additional knowledge. What is she not telling you?
 7

8 MR. GILLIAM: How a base manager could
 9 -- I guess what I am trying to understand is how a
 10 base manager could terminate a flight attendant
 without having approval.

11 MR. CORRELL: She didn't say that was
 12 possible.

13 MR. GILLIAM: Okay.

14 MR. CORRELL: You just asked her, can
 15 an assistant base manager terminate without a base
 16 manager? She said, no. She said she wasn't the
 17 base manager at the time of termination and she
 18 doesn't know what was happening with the actual
 19 base manager at that time.

20 Q. (By Mr. Gilliam) Do you know who the base
 21 manager was that followed you?

22 A. Yes.

23 Q. And what was the name of the base manager
 24 that followed you?

25 A. Deborah Edwards.

Page 74

1 Q. Okay. So what stage had the investigation
 2 reached before you left?

3 A. It had just begun. My last day in the
 4 base is the day that investigation began.

5 Q. Okay. Thank you. Okay. And do you
 6 remember cases of other flight attendants who were
 7 terminated for posting political views on social
 8 media?

9 A. No.

10 Q. Okay. Do you know how long the
 11 fact-finding meeting lasted?

12 A. I don't know.

13 Q. Okay. And do you know where the
 14 fact-finding meeting was held?

15 A. Yes.

16 Q. Okay. Where was that?

17 A. It was in Ed's office.

18 Q. Okay. And after the meeting, did you talk
 19 to Ed about the fact-finding?

20 A. I don't recall.

21 Q. Okay. After the fact-finding meeting, did
 22 you give any feedback to Ed to help him make his
 23 decision?

24 A. No.

25 Q. You didn't?

Page 73

1 A. No, not that I recall.

2 Q. Okay.

3 MR. GILLIAM: Can we go off the record
 4 for a second?

5 THE VIDEOGRAPHER: We are off record
 6 at 11:22 a.m.

7 (Recess taken.)

8 THE VIDEOGRAPHER: We are back on
 9 record at 11:44 a.m.

10 Q. (By Mr. Gilliam) Okay. Ms. Jones, I
 11 think we were talking, when we left off, about the
 12 fact-finding and maybe what -- what happened after
 13 the fact-finding. And I -- so let's start here.

14 After the fact-finding, did you have
 15 any communications with Mr. Schneider about what
 16 happened in the fact-finding?

17 A. I don't remember.

18 Q. Okay. So do you remember testifying in
 19 the arbitration of Ms. Charlene Carter's -- I
 20 guess, the arbitration involving her -- her
 21 termination?

22 A. Yes.

23 Q. Okay. If I could direct you to the -- the
 24 document we just sent you.

25 A. Okay.

Page 75

Page 74

1 Q. And, specifically, to Page 202. Let's
 2 see. Actually, what we might want to do is back up
 3 a bit.

4 THE REPORTER: And which exhibit is
 5 this or document number?

6 MR. GILLIAM: It's not an exhibit or
 7 document number. Do you -- would you like me to
 8 send it to you?

9 THE REPORTER: We can get --

10 MR. GILLIAM: It's not --

11 THE REPORTER: It's not a problem.

12 MR. GILLIAM: It's not going to be
 13 admitted as an exhibit.

14 A. Okay.

15 Q. (By Mr. Gilliam) And I don't know if you
 16 want to scroll up to -- to verify that this is the
 17 testimony you gave before I continue. Does -- does
 18 this look like the testimony you gave --

19 A. I -- I don't know. I need a little more
 20 time to look at it.

21 Q. Sure.

22 A. I am just scrolling to try to find the
 23 beginning of this.

24 MR. CORRELL: Meggan, I believe it
 25 starts on page -- either 181 or 182 with your

Page 77

Page 79

1 testimony.
 2 THE WITNESS: Okay. Thank you.
 3 Q. (By Mr. Gilliam) 181.
 4 **A. Okay. I see on Page 181 where I began my**
testimony.
 5 Q. Okay. And if you could scroll back down
 6 to 202.
 7 **A. Okay. I am just looking over it to make**
sure that that's all me.
 8 Q. Sure, yeah. Please do. It's long.
 9 **A. Sorry. And I just accidentally clicked**
 10 **into a totally different page.**
 11 Q. That's okay. Take your time.
 12 **A. Getting used to this virtual thing, so**
 13 **bear with me. Which page did you want me to end**
 14 **on? I am sorry.**
 15 Q. 202.
 16 **A. I am almost there.**
 17 Q. All right. No problem.
 18 **A. Okay.**
 19 Q. All right. Do you see down on Line 12
 20 where Ms. Gehrke asks, I want to ask you some
 21 questions about the decision to terminate
 22 Ms. Carter.
 23 **A. Yes.**

1 **A. I don't remember the specifics.**
 2 Q. Okay. Any general details you remember?
 3 **A. I don't remember.**
 4 Q. Okay. And -- so did -- did you provide
 5 any feedback to Mr. Schneider about what course of
 6 action he should take with regard to Ms. Carter?
 7 **A. I don't recall.**
 8 Q. Okay. Did Mr. Schneider tell you, after
 9 the fact-finding meeting, what he planned to do?
 10 **A. I -- I do recall him saying that he was**
 11 **going to look into some of the information she**
 12 **provided.**
 13 Q. Did he say what he was going to look into?
 14 **A. I don't recall.**
 15 Q. Was there something specific that
 16 Ms. Carter had provided that he was going to look
 17 into?
 18 **A. I don't remember.**
 19 Q. Okay. And after the fact-finding meeting,
 20 did you communicate with anyone else involved in
 21 the investigation about the fact-finding meeting
 22 itself?
 23 **A. I don't remember.**
 24 Q. Okay. Do you know if you contacted -- if
 25 you communicated with anyone about it?

Page 78

Page 80

1 Q. Okay. And then she asks you a couple more
 2 questions. And then on 19 and 20, she asks, and
 3 did you provide any feedback to Mr. Schneider to
 4 help them in making that decision -- help him in
 5 making that decision?
 6 **A. I see that, yes.**
 7 Q. Okay. And your answer there says, we had
 8 some discussion after the meeting about the
 9 information provided, but that was pretty much it
 10 for me.
 11 **A. Yes.**
 12 Q. Okay. And does that help refresh your
 13 memory as to your discussions with Mr. Schneider
 14 after the fact-finding meeting?
 15 **A. Yes, it does.**
 16 Q. Okay. What do you remember about the
 17 discussion you had at -- about the information
 18 provided at the fact-finding meeting?
 19 **A. I don't remember a lot about it. We just**
 20 **discussed what she had said in the meeting.**
 21 Q. Discussed what Charlene had said in the
 22 meeting?
 23 **A. Yeah. What she presented in the meeting.**
 24 Q. Okay. What did you discuss about what she
 25 had presented?

1 **A. I don't remember. It -- it wasn't my**
 2 **investigation, so -- it was Ed's investigation.**
 3 Q. Okay. At any point during the course of
 4 his investigation, did he ask your opinion?
 5 **A. I don't remember.**
 6 Q. Okay. Do you know if Ed did end up
 7 looking into the information she provided?
 8 **A. I don't know.**
 9 Q. Okay. Do you know when Ed reached a
 10 conclusion as to what to do with the matter?
 11 **A. I don't remember.**
 12 Q. Okay. And you do recall that Ms. Carter
 13 was terminated for violation of at least the social
 14 media policy?
 15 **A. Yes.**
 16 Q. Okay. Do you know if she received a
 17 termination letter?
 18 **A. She was sent a termination letter.**
 19 Q. Okay.
 20 **A. -- received it.**
 21 Q. Okay.
 22 THE REPORTER: I am sorry. I didn't
 23 hear the last part.
 24 **A. I don't know if she received it, but she**
 25 **was sent a letter.**

Page 81

Page 83

1 THE REPORTER: Thank you.
 2 Q. (By Mr. Gilliam) Okay. Do you know who
 3 sent her a termination letter?
 4 **A. Ed Schneider.**
 5 Q. All right. Did -- did you assist Ed in
 6 preparing the termination letter?
 7 **A. No.**
 8 Q. Okay. Do you know if Ed wrote it all on
 9 his own?
 10 **A. I don't know.**
 11 Q. Okay. Did you see a copy of it before it
 12 was sent?
 13 **A. No.**
 14 Q. Okay. Do you know if employee relations
 15 reached any final conclusions regarding the
 16 termination?
 17 **A. I don't recall what they came back with.**
 18 Q. Okay. Do you recall that they came back
 19 with something?
 20 **A. They do. They did come back with a
 21 result, but I -- the decision to terminate is not
 22 their decision.**
 23 Q. Okay. And -- how do you know that they
 24 came back with something?
 25 **A. Because that's our process. Any time they**

1 minutes work for everybody else?
 2 MR. CORRELL: Is that okay with you,
 3 Ms. Jones?
 4 THE WITNESS: Yes.
 5 MR. CORRELL: Fine by us, then.
 6 MR. GILLIAM: Okay. We will do 30.
 7 THE VIDEOGRAPHER: We are off record
 8 at 12:00 p.m.
 9 (Lunch break had.)
 10 THE VIDEOGRAPHER: We are back on
 11 record at 12:35 p.m.
 12 MR. GILLIAM: So I don't think we have
 13 any more questions for the witness at this time.
 14 But, as before, we will reserve the right to reopen
 15 the deposition pending the need for any follow-up
 16 discovery.
 17 MR. CORRELL: And Southwest reasserts
 18 the same objections; it has asserted its same
 19 positions that it has asserted with respect to that
 20 claim that the dep -- the deposition should be
 21 reopened.
 22 MR. GILLIAM: We pass the witness.
 23 MR. GREENFIELD: And defendant --
 24 MR. CORRELL: Ms. Jones --
 25 MR. GREENFIELD: -- TWU Local 556 will

Page 82

Page 84

1 **are involved, they come back with a conclusion.**
 2 Q. Okay. Do you know if the HR VP came back
 3 with any conclusion?
 4 **A. I don't know.**
 5 Q. Okay. Would that be part of the process
 6 too; that the HR VP comes back with a conclusion?
 7 **A. I am not super familiar with their process
 8 on the HR VP side.**
 9 Q. Okay. Okay.
 10 MR. GILLIAM: So I would probably like
 11 to take another break.
 12 MR. CORRELL: I am on mute. Yeah,
 13 that's -- that's fine by us. Do you want to go
 14 ahead and do lunch or what are you thinking?
 15 MR. GILLIAM: I would say let's --
 16 let's go ahead and do lunch. I may not have very
 17 much when we come back.
 18 MR. CORRELL: Okay.
 19 MR. GILLIAM: But that's probably the
 20 best way to do it, I would say.
 21 MR. CORRELL: Okay. Do you want --
 22 THE VIDEOGRAPHER: So off record?
 23 MR. CORRELL: -- to do 45 minutes?
 24 What works for you?
 25 MR. GILLIAM: Let's see. Does 30

1 reserve its questions for time of trial. I am
 2 sorry, Michael. Go ahead.
 3 MR. CORRELL: No worries.
 4 **EXAMINATION**
 5 **BY MR. CORRELL:**
 6 Q. Ms. Jones, I have just a couple of quick
 7 questions for you. First, you understand that part
 8 of this lawsuit alleges that Ms. Carter was treated
 9 less favorably because she was an objector or
 10 nonmember of 556, correct?
 11 **A. Yes.**
 12 Q. Do you have any personal bias or animus
 13 against flight attendants who opt-out from the
 14 union or object to the union?
 15 **A. No.**
 16 Q. To your knowledge, did Ms. Carter's status
 17 as an objector to the union play any role in the
 18 decisions to terminate her?
 19 **A. No.**
 20 Q. You also understand that this case alleges
 21 that Ms. Carter was treated less favorably in the
 22 termination process because of her religion?
 23 **A. Yes.**
 24 Q. And you understand that that's linked to
 25 her expression of pro-life views?

Page 85

1 A. Yes.
2 Q. Do you personally have a view on abortion
3 as between pro-life and pro-choice?
4 A. Yes.
5 Q. What is your position?
6 A. It's complicated for me to answer that
7 because I am more pro-life; it's not a choice I
8 would make for myself, but I don't feel like I
9 should tell somebody else what they can or can't
10 do.
11 Q. Do you have a personal bias or animus
12 against individuals who express no pro-life views?
13 A. No.
14 Q. Do you have a personal animus or bias
15 against individuals who profess a Christian faith?
16 A. No.
17 Q. To your knowledge, did the fact that
18 Ms. Carter's communications were pro-life as
19 opposed to pro-choice have any impact on the
20 decision to terminate her?
21 A. No.
22 Q. To your knowledge, did the fact that
23 Ms. Carter professed that her pro-life views were
24 related to her religious beliefs have any impact on
25 the decision to terminate her?

Page 86

1 A. No.
2 MR. CORRELL: I pass the witness.
3 MR. GILLIAM: And I have no additional
4 questions.
5 THE VIDEOGRAPHER: We are off record
6 at 12:38 p.m. End of deposition. End of media.
7 THE REPORTER: Okay. Mr. Correll, did
8 you want to -- me to have it -- send it to you for
9 reading and signing?
10 MR. CORRELL: Yes, please.
11 (End of Proceedings.)
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Page 87

1 CHANGES AND SIGNATURE
2 WITNESS NAME: MEGGAN JONES
3 DATE OF DEPOSITION: NOVEMBER 4, 2020
4 PAGE LINE CHANGEREASON
5 _____
6 _____
7 _____
8 _____
9 _____
10 _____
11 _____
12 _____
13 _____
14 _____
15 _____
16 _____
17 _____
18 _____
19 _____
20 _____
21 _____
22 _____
23 _____
24 _____
25 _____

Page 88

1 I, MEGGAN JONES, have read the foregoing
2 deposition and hereby affix my signature that same
3 is true and correct, except as noted above.
4
5 _____
6 MEGGAN JONES
7 THE STATE OF _____
8 COUNTY OF _____
9 Before me, _____, on this day
10 personally appeared MEGGAN JONES, known to me (or
11 proved to me under oath or through _____) to
12 be the person whose name is subscribed to the
13 foregoing instrument and acknowledged to me that
14 they executed the same for the purposes and
15 consideration therein expressed.
16
17 Given under my hand and seal of office this _____
18 day of _____, 2020.
19
20 _____
21 NOTARY PUBLIC IN AND FOR THE
22 STATE OF _____
23
24 MY COMMISSION EXPIRES: _____
25

Page 89

1 REPORTER'S CERTIFICATION
2 IN THE UNITED STATES DISTRICT COURT
3 FOR THE NORTHERN DISTRICT OF TEXAS
4 DALLAS DIVISION
5 CHARLENE CARTER)
6 VS.) CIVIL ACTION NO.
7) 3:17-CV-02278-X
8)
9 SOUTHWEST AIRLINES CO., AND)
10 TRANSPORT WORKERS UNION OF)
11 AMERICA, LOCAL 556)
12 -----
13 CONFIDENTIAL
14 DEPOSITION OF MEGGAN JONES
15 NOVEMBER 4, 2020
16 (REPORTED REMOTELY)
17 -----
18 I, CHARIS M. HENDRICK, Certified Shorthand
19 Reporter in and for the State of Texas, do hereby
certify to the following:
20 That the witness, MEGGAN JONES, was by me
21 duly sworn and that the transcript of the oral
22 deposition is a true record of the testimony given
23 by the witness.
24 I further certify that pursuant to Federal
25 Rules of Civil Procedure, Rule 30(e)(1)(A) and (B)
as well as Rule 30(e)(2), that review of the
transcript and signature of the deponent:
xx was requested by the deponent and/or a
party before completion of the deposition.

Page 90

1 _____ was not requested by the deponent and/or
2 a party before the completion of the deposition.
3 I further certify that I am neither
4 attorney nor counsel for, nor related to or
5 employed by any of the parties to the action in
6 which this deposition is taken and further that I
7 am not a relative or employee of any attorney of
8 record in this cause, nor am I financially or
9 otherwise interested in the outcome of the action.

10 The amount of time used by each party at
11 the deposition is as follows:
12 Mr. Gilliam - 2:16 hours/minutes
13 Mr. Correll - 2 minutes
14

15 Subscribed and sworn to on this 12th day
16 of November, 2020.

17
18
19 
CHARIS M. HENDRICK, CSR # 3469

20 Certification Expires: 10-31-21
21 Bradford Court Reporting, LLC
22 7015 Mumford Street
23 Dallas, Texas 75252
24 Telephone 972-931-2799
Facsimile 972-931-1199
Firm Registration No. 38

A				
a.m 1:19 4:4	4:24 5:13 10:4 23:3 64:15 69:6 89:6	areas 29:25 Armstrong 2:21 37:13 39:17	28:1,15,23 29:3,9 30:1,6,7 30:17,17,25	69:3 71:24 75:8 76:2 77:6 81:17,18,20,24
ability 5:21	airplane 26:18	array 15:19	31:21 32:5	82:1,2,6,17 83:10
able 51:14 71:15	27:19 51:2,5,7 51:10 52:4	asked 24:18 30:15 31:18 44:8 45:22	35:2 60:1 61:4 66:10 69:10,10 72:2,20 73:9	badgering 73:2 Barnett 56:16 56:22 57:2,5 64:2
aborted 58:21	alleged 27:6	47:1,3,5 67:15	attendant's 29:3	Barrera 14:7 41:19
abortion 85:2	alleges 84:8,20	69:19 70:9	attendants	base 8:8,8,10,10 8:14,18,22,23
above-styled	America 1:6 2:13 5:14 6:20 10:4 89:7	73:14	10:18 13:7,10 13:12 17:15 24:14 25:7,10	8:25 9:13,16 10:15,17,19
1:18	American 10:7	asking 30:22 42:20,22 45:20	25:21 26:17,25 27:11,21 29:7	11:3,7,8,10 12:8,8 13:17
accidentally	amount 90:10	asks 77:22 78:1 78:2	74:6 84:13	14:4,5,8,19,22 15:9,14 16:5
77:11	and/or 89:24 90:1	aspect 61:24	attendants'	16:15,16 17:7 17:20 19:5,15
accommodation	animus 84:12 85:11,14	asserted 83:18 83:19	35:19	21:18,21 22:13 23:8 24:14,19
28:19,24 29:4	answer 5:21 6:4	assist 19:19 81:5	attended 63:24	25:7,22 28:14 29:19 31:25
29:8,11,13,19	6:5 15:2,2,3 33:22 42:13	assistant 8:22,24 9:13 10:15	attention 36:18 38:25 55:8	34:10,13,25,25 35:1,25 36:1,5
30:2,15,19	53:2 64:24	11:3 12:8	attorney 5:12 90:4,7	43:6 44:14,15 48:12 56:25
31:7,13 32:1	71:19 73:3 78:7 85:6	13:17 14:4,8 14:18,22 15:9	Audrey 3:11 32:17,19,21 33:11 42:4,24	57:1 66:13,19 66:21,24 67:8
acknowledged	answered 67:16	15:14 16:5,7 16:16 17:6	51:17 55:10,14 57:17,21 58:13	67:19,19,23 70:1,2,6,7,13
88:11	70:10	19:5,15,19	Audrey's 53:13 authority 18:14 19:16,23 71:3	70:21 71:2,12 71:13,14,20,24
acronym 34:1	answers 1:16 5:24	21:21 48:12 66:18,20,24	avenues 28:4 33:4	71:25,25 72:4 72:5,19 73:7,9 73:15,15,17,19
Act 6:22 7:5,10	anybody 13:3 36:25 57:2	67:8,19,19 70:7,12,21	aware 6:24 7:2,3	73:20,23 74:4
29:17,18 30:5	apart 25:20	71:2,13,24	assuming 53:20 7:6,7,12,13	basically 5:19 basis 17:12
30:8,10 31:12	27:15,20 31:11	72:5,19 73:15	attached 1:25 19:2 31:23,24	Bates-number...
action 1:4 79:6	appearances 3:2 4:19	assisting 55:5	32:14 59:11,21	37:16
89:5 90:5,9	appeared 53:11 53:14 88:9	assume 6:10	64:14 69:23	bear 77:15 began 62:18
activities 28:11	approach 16:12	assuming 53:20		
activity 28:7,12	19:25 71:15 72:1 73:10	attached 1:25 41:21,22 47:19		
actual 28:25	approval 19:24	47:21 63:7		
29:1 73:18	19:25 71:15 72:1 73:10	attaches 41:20		
Adam 2:14 4:25	approve 20:2	attendant 9:25		
additional 54:3	10:3,6 13:22	10:3,6 13:22		
73:6 86:3	19:24 20:3	19:24 20:3		
administering	21:7,10,22	21:7,10,22		
4:14	22:15,20,23	22:15,20,23		
administration	24:21 25:18	24:21 25:18		
7:20	26:12 27:5	26:12 27:5		
admitted 76:13				
AFA 10:10				
affix 88:1				
agreed 4:11				
agreenfield@c...				
2:17				
ahead 15:3				
82:14,16 84:2				
Airlines 1:5 2:7				

74:4 77:4	called 31:9	89:13	clear 5:23 6:2	33:16 52:4,7
beginning 76:23	Calls 19:7 29:21	certify 89:15,20	clicked 77:11	52:19 53:5,9
begun 74:3	71:8	90:3	close 16:15,21	53:13,19
behalf 5:1	careful 11:17	chain 42:3,8,9	73:1,2	complaints 21:1
beliefs 85:24	18:20	42:24	Cloutman 2:14	27:22
believe 24:4	carefully 13:11	chance 37:23	2:15 5:3,3 48:4	completion
37:9 39:20	carpal 31:4	49:3	16:5,9,13	89:25 90:2
56:4 57:24	carries 40:12	changed 9:11	collaboration	complicated
76:24	Carter 1:3 2:20	CHANGERE...	16:5,9,13	53:3 85:6
believed 28:7	4:22 5:12,13	87:4	Colorado 1:22	concerning 25:2
best 5:21 6:4	6:18 13:18,21	Changes 3:7	4:11	concerns 55:12
16:12 82:20	22:8 25:15	87:1	colored 31:1	conclusion
better 30:14	32:6 33:16	characteristics	67:13	80:10 82:1,3,6
bias 84:12 85:11	47:12 64:1	53:8	come 13:20	conclusions
85:14	77:24 79:6,16	Charis 1:20 4:13	15:18 45:25	81:15
bit 7:15 64:10,18	80:12 84:8,21	89:13 90:19	81:20 82:1,17	conduct 10:24
71:24 76:3	85:23 89:4	Charlene 1:3	comes 82:6	14:17 17:11,13
Black 66:5	Carter's 6:15	2:20 4:22 5:12	coming 13:23	18:11 19:3
68:11 69:1,5	32:9 36:9 45:3	13:18 21:15	comment 65:14	20:14 24:2
board 34:2	45:8 46:17,20	22:8 25:15	COMMISSION	26:3 27:5 29:3
62:15	47:24 61:25	45:7 46:17,19	88:20	conducted 4:8
bottom 37:18	75:19 84:16	52:14 55:17,19	common 27:25	18:19,22 19:13
38:16 39:24	85:18	57:8,10,13,20	communicate	conducting 20:6
42:8	case 5:15 6:13	58:13,25 64:1	33:20 61:23	45:7
brace 30:13,24	6:16 13:18	64:19 75:19	79:20	conferenced
30:25 31:3,4	16:8 30:1 35:4	78:21 89:4	communicated	64:3
Braddock 2:4	35:17,22 48:2	Charlene's	33:7 34:6,9,20	CONFIDENT...
Bradford 90:20	53:24 65:23	35:17,22 41:2	45:3 48:18	1:9 89:9
Brandon 66:9	84:20	41:7 48:2 65:6	57:2 79:25	confirm 37:11
67:13,20,23	cases 24:20 35:5	check 39:8	communication	39:23 51:20
68:1,8,10 70:4	35:7,9,13,14	choice 85:7	36:2 54:25	Confirming
70:14	35:15,19 74:6	Chris 34:7 35:13	communicatio...	37:25
Brandon's	categories 52:5	35:16,18,21,23	11:12,22 30:9	connect 64:14
70:25	category 51:8,12	55:23,25 64:1	33:15,18 34:23	connection
break 5:16,17	53:12,15	Christian 85:15	34:24 35:22	65:15
43:14,18 44:5	cause 1:19 90:8	Christine 50:6	44:21 45:13,16	consider 52:5
82:11 83:9	CC'd 54:23,24	50:12,18	54:4 56:6 57:4	consideration
bullying 24:11	54:25 55:2	city 4:20	75:15 85:18	88:12
24:15,22 56:21	63:15	Civil 1:4,23 6:21	company 7:12	consult 70:22
business 11:12	CC's 42:25	89:5,21	8:7,21 9:14	contacted 29:18
11:22	Central 4:4	claim 6:19,25	10:2,2 27:12	30:5,11,18
busy 17:16	certain 12:1	7:4 83:20	complained	31:12,16 50:23
	Certificate 3:8	claims 6:16	28:15	79:24
	Certification	7:13	complaint 6:12	content 68:12
	89:1 90:20	clarification	31:22 32:9,11	contents 23:18
	Certified 1:20	30:13	32:13,14,16,18	23:19
		clarify 21:15		

continue 76:17	COVID-19 1:24	definitely 22:6	different 15:19	39:2,5,6,16
conversation 45:24 60:13	4:9	Denise 50:8,12	62:25 77:12	40:11,15,16
conversations 33:10 57:9	created 69:14	50:17,21 54:19	DiPippa 34:18	41:10,11,14,22
coordinate 15:22	CSR 4:14 90:19	55:9 63:14	direct 36:18	42:9,11 44:4,6
coordinators 12:11,13,20	current 1:23 4:8	64:2,3	38:25 44:4	47:22 48:22,22
copied 38:12	7:17 8:5 61:6	Denver 8:23,25	55:8 62:20	51:19 54:7
copy 81:11	customer 27:18	9:13,15 10:15	64:6 65:10	60:17,20,21
corner 37:18	28:1	11:10 13:17	75:23	62:22,24 63:2
correct 15:15	customers 26:7	14:4,5 17:20	directly 12:5,12	64:24 75:24
31:17 38:8	27:20 31:2	20:20 21:18,21	13:6,8,15 19:1	76:5,7
40:21,22 42:10		22:13 24:14,19	30:18	doing 20:5
53:21 54:22	D	25:7,22 28:14	disability 31:6	domicile 34:4
59:17 63:15	Dallas 1:2 2:10	29:19 31:25	Disaster 1:24	door 16:18
70:11 72:2,3	2:16 4:24 5:1,4	34:8,19 36:5	4:10	draft 63:22
84:10 88:2	33:23 89:3	57:1 66:11	disciplinary	driven 17:14
Correll 2:8 3:5	90:21	Denver-base	17:20 18:4	DSL 26:12
4:23,23 14:24	date 4:3 87:3	21:9	19:20 20:7	duly 5:6 89:17
19:7 29:21	dated 38:6	Denver-based	discipline 19:23	Dustin 14:7
37:2,8 39:8,11	dates 65:7	28:23	20:3 21:6 27:7	41:19
39:15 42:11	Dave 3:13 11:20	dep 83:20	disciplined	duties 30:14
43:20 52:25	11:22,25 38:6	department 8:3	24:15,21 25:22	duty 7:1
64:23 67:15	41:18,25 42:19	29:12,16 56:7	27:1	
70:9 71:8,17	44:25 48:15	depend 15:23	discovered 28:6	E
72:12,14,21	Davis 44:23	53:4	discovery 83:16	E 2:1,1
73:1,11,14	day 67:2,13 68:6	depending	discrimination	earlier 47:20,21
76:24 82:12,18	74:3,4 88:9,14	12:15	25:3 28:16,17	ecloutman@la...
82:21,23 83:2	90:15	depiction 65:17	31:22	2:17
83:5,17,24	deal 20:7	deponent 89:23	discuss 59:9	Ed 3:15 5:3 11:4
84:3,5 86:2,7	dealt 52:17 60:3	89:24 90:1	78:24	11:6,7,8,19,20
86:10 90:13	DEBM 33:21,25	deposed 5:17	discussed 78:20	18:16,25,25
corresponded 46:13	34:13 36:1,4	deposition 1:9	78:21	19:3,13,16,18
counsel 4:11,18	DEBMs 34:5,9	1:16 4:7,15	discussion 35:3	36:14 41:19,25
37:2 72:17,21	34:15,17	83:15,20 86:6	78:8,17	42:20 45:1,2,6
90:4	Deborah 73:25	87:3 88:1	discussions	45:19,20 47:7
County 4:16	decision 20:2	89:10,18,25	78:13	47:8,8 49:9
88:7	53:9 69:21	90:2,6,11	DISTRICT 1:1	50:23 52:16
couple 78:1 84:6	70:4,13,17	details 23:23	1:1 89:2,2	54:2,19,25
course 11:12,21	71:7,10,14,21	35:9 46:4 79:2	disturbing	55:2,13 57:9
79:5 80:3	72:6 74:23	determine 51:14	27:13	57:24,25 58:2
court 1:1 4:4,13	77:23 78:4,5	development	DIVISION 1:2	59:6 60:5,8,13
89:2 90:20	81:21,22 85:20	10:25	89:3	63:13 64:2,9
	85:25	DG 49:10	document 3:12	64:12,17 65:14
	decisions 84:18	diagonally 17:1	3:14,16 36:19	74:19,22 80:6
	defendant 2:7	dick-sucking	36:22,23 37:3	80:9 81:4,5,8
	2:12 4:24 5:1	26:13	37:6,7,10,12	Ed's 11:13,14,14
	83:23	dictate 16:8	37:20 38:25	18:23 19:24,25
	DEFENSE 2:3			74:17 80:2

Edie 56:16,22 57:2,5 64:2,3	entirely 6:17 12:1 50:3	fact 85:17,22 fact-finding	65:20 67:23 68:6	42:17
EDWARD 2:14	evaluate 30:23	35:3 41:4,8	Firm 90:23	FOUNDATION
Edwards 73:25	evasive 72:10,13	46:17,20 55:17	first 5:6 32:5	2:4
effort 60:25	72:16,19	55:20,24 56:6	36:4 51:25	four 8:19 9:1,20
either 6:25	events 35:1	57:8,10,13,16	59:18 60:12	fourth 37:20,22
48:11 50:11	everybody 43:17	57:19 58:5	61:10 62:22	frequently 17:13
68:6 76:25	83:1	60:10 63:21,24	63:18 84:7	17:18
elected 10:11	exact 9:5 23:18	74:11,14,19,21	five 17:23,24	fringe 51:7
61:6	exactly 23:6,22	75:12,13,14,16	five-minute	53:11
elimination 68:5	36:10,16 46:3	78:14,18 79:9	43:14,17	front 36:21
Ellis 4:16	51:14	79:19,21	flesh 31:1	further 89:20
Elm 2:15	Examination	factor 53:9	flight 9:24 10:3	90:3,6
email 3:11,13,15	3:4,5 5:7 84:4	fair 7:1	10:6,18 13:7	G
37:13 38:12,14	example 19:17	faith 85:15	13:10,12,22	Garrett 25:16
38:17 39:16	excuse 14:15	falling 31:9	17:15 19:24	25:17
40:6 41:18,23	17:4 24:21	familiar 6:15	20:3 21:6,9,22	Garrett's 26:1
42:3,4,9,17,24	25:12	24:10,12 25:1	22:15,20,23	gears 7:14
44:23,25 45:10	executed 88:11	28:18 30:1	24:13,20 25:6	Gehrke 77:22
47:19,21 49:7	executive 34:2	38:15,18 82:7	25:10,17,21	general 79:2
49:24 54:3,19	62:15	far 60:7	26:11,17,25	gestures 5:25
54:21,23 55:4	exercise 7:9	favorably 84:9	27:5,11,21	getting 73:1,2
55:7,9,14	exhibit 3:11,13	84:21	28:1,15,23	77:14
62:25 63:13	3:15 36:19,25	feasibility 30:12	29:2,3,7,9 30:1	Gilliam 2:3 3:4
emails 56:2	37:1,4,6,6,10	February 38:6	4:21,21 5:8,11	4:21,21 5:8,11
emergency 1:23	39:11 76:4,6	Federal 1:22	15:7 19:11	15:7 19:11
4:9 43:14	76:13	89:20	29:24 37:5,15	29:24 37:5,15
Emlet 3:15	exhibits 3:10	feedback 74:22	32:5 35:2,19	39:9,14,21
56:11,13 63:13	39:6,12	78:3 79:5	60:1 61:4	42:13 43:10,16
employed 90:5	Experience 16:7	feel 27:13 72:9	66:10 69:9,10	44:3 48:6 53:2
employee 23:3	Expires 88:20	85:8	72:1,20 73:9	65:2 67:18
25:15,16 49:10	90:20	Feldhausen	74:6 84:13	70:12 71:11,23
49:19,23 50:24	explain 71:16	22:24 23:14,17	flirting 26:18	72:18,25 73:7
51:6,8 52:8,19	express 85:12	24:2	focus 60:19	73:13,20 75:3
52:24 53:10,12	expressed 88:12	Feldhausen's	follow 40:21	75:10 76:6,10
54:4,20 65:20	expression	23:1	follow-up 83:15	76:12,15 77:3
65:24 66:7	84:25	fetus 58:21	followed 37:17	81:2 82:10,15
71:4 81:14	F	final 81:15	73:21,24	82:19,25 83:6
90:7	Facebook 32:6,9	financially 90:8	following 36:25	83:12,22 86:3
employees 26:5	36:9 42:21	find 39:21 76:22	89:15	90:12
27:12,15	45:4,8,14 47:1	fine 4:20 82:13	follows 5:6	girl 26:18
ended 72:24	47:3,4,6,9,12	83:5	90:11	give 5:23 9:20
enforcing 14:15	47:19,24 48:2	finish 6:3,5	88:11	19:17 36:19
engaged 26:4	60:14 61:21,25	fire 66:15 68:1	formally 8:15	41:25 45:1
ensued 66:1	64:13 65:6,15	71:14 72:1	former 25:16	74:22
entire 34:1	Facsimile 90:22	fired 25:7,11	forwarded	given 88:14
				89:18

go 15:3 51:13,16 51:18 62:22 63:1 64:9,18 75:3 82:13,16 84:2 goes 64:17 going 59:12 60:24 76:12 79:11,13,16 Golden 1:22 4:10 good 5:9 43:20 graphic 58:17 58:18,20 59:14 great 43:21 Greenfield 2:14 2:15 4:25,25 43:9,11 83:23 83:25 group 49:20 53:6 54:20 56:20 guess 9:3 11:16 12:7 14:14 15:12 18:10,14 27:16 30:21 33:14 35:12 38:5 40:14,16 41:5 42:7 49:22 53:7 60:14 64:11 71:11 73:8 75:20 Gutierrez 50:8 50:12,17,21 54:19 63:14 64:2	 happen 15:18 60:24 happened 21:1 46:23 65:23 72:9 75:12,16 happening 17:15 19:2 73:18 happenings 34:25 harassing 25:2 harassment 25:3 25:3,23 26:2 26:21 27:2 49:17,18 52:6 52:18,20,23 53:6,21,25 Harwood 2:9 hateful 68:21 hazing 24:11,16 24:22 head 5:24 28:3 hear 27:9,16,21 31:20 61:13 80:23 Hector 14:7 41:19 Heidi 67:6 68:4 held 7:21 74:14 hello 35:24 help 38:19 46:2 74:22 78:4,4 78:12 Hendrick 1:20 4:13 89:13 90:19 hereto 1:25 hit 55:1 hold 8:21 9:14 10:11 holding 8:5 61:1 home 4:16 hours/minutes 90:12 HR 82:2,6,8	Hudson 43:1 huh-uhs 5:24 humming 26:16 hypothetical 71:18 <hr/> I idea 28:19 III 2:14 images 41:20,21 41:21 47:23 48:7,7 58:20 59:14,19 impact 85:19,24 important 5:23 inappropriate 26:6,8,16 incident 23:5 69:24 incidents 17:20 18:4 29:6 incite 68:22,24 include 10:23 included 10:22 10:25 54:21 including 40:16 incompetent 29:8 incomplete 71:18 INDEX 3:1 indication 52:7 52:10 individuals 12:5 33:22 65:25 85:12,15 inflight 8:8,14 8:23 9:15,17 12:10,11,13,19 13:14 inform 59:22 information 70:18 71:21 73:5 74:1,4 79:21 80:2,2,4 investigations 17:6,12 18:12 information-g...	 46:21,25 informed 60:9 infringe 53:14 infringed 51:11 inquire 30:11 instance 1:17 14:14 29:2 30:9 31:11 instances 28:5 28:14,22 instructing 73:3 instrument 88:11 interested 90:9 interrupt 43:12 inverted 37:3 39:7 investigate 18:10,15 71:3 investigated 21:2 investigates 49:14 investigating 10:23 14:17 15:8 20:1 27:4 48:8 investigation 15:24,24 16:4 17:4 18:23 20:5,12 36:8 36:15 38:22 42:20 45:7,12 45:17,20,21 46:1,5,8,14,24 48:9,19 50:13 50:16,19 55:6 56:8,14,17,23 57:15,18 61:21 61:25 66:1 inform 59:22 information 70:18 71:21 73:5 74:1,4 79:21 80:2,2,4 investigations 17:6,12 18:12 information-g...	 19:20 20:6,10 20:15 invests 49:16 involved 19:1 20:11 29:4,7 36:8,10 45:25 46:5 50:12,15 50:18 52:4 53:8 56:14,17 56:23 69:16,18 69:20,21 70:22 79:20 82:1 involvement 18:16,24 19:4 19:14 36:12 involving 29:6 30:19,23 36:8 52:17 75:20 issue 14:23 19:23 20:2,3 31:13 48:2 49:15 53:14 issues 14:12 49:16 52:17 <hr/> J January 8:16,17 9:9 23:11 Jessica 34:7,23 61:17,20,24 Jim 67:2,12 68:6 job 8:14,21 9:4 9:13 10:16,17 30:13 John 34:18 Johnson 50:6,12 50:18 Jones 1:10,16 3:3 4:7 5:5,9 14:25 19:9 37:8 39:13 44:3 64:25 71:19 75:10 83:3,24 84:6 87:2 88:1,5,9 89:10,16 jumbled 62:21
---	---	--	---	---

jump 19:9	60:12 61:7,12 62:2,4,5,14,16 K kind 31:3 53:3	level 16:7 limited 34:24 35:24 Line 77:21 87:4	ma'am 38:1 MACK 2:19 making 69:21 78:4,5 management 28:6 manager 7:19 8:8,10,14,18 Lives 66:5 68:11 69:1,5 LLC 90:20 LLP 2:9 local 1:6 2:13 5:1,4,14 6:20 33:20,21 34:4 83:25 89:7 located 1:21 4:10 location 67:20 locations 4:19 31:20 long 7:15,21 8:9 8:24 9:17 Lacore 43:1 language 53:18 53:20 Las 43:6 44:14 44:16 lasted 74:11 LAUREN 2:21 LAW 2:15 lawsuit 84:8 51:18 54:6 leader 11:16 63:5 76:18,20 leaders 11:14 79:11,13,16 learn 32:5 61:10 leave 9:7 left 9:9 44:5 73:4 74:2 75:11 LEGAL 2:3 let's 14:3 38:24 40:9 43:16 48:21 52:16 62:20,21 63:1 65:10 71:23 75:13 76:1 82:15,16,25 letter 80:17,18 80:25 81:3,6	2:11 mean 11:14 18:13 21:14 37:7 58:19 60:7 61:3 68:19 means 4:16 27:23 61:4 media 20:8,11 20:15,20 21:2 21:11,23 22:10 22:16 24:6 28:11 59:25 65:21 74:8 80:14 86:6 meeting 35:3 41:2,3,4,8 59:12,21 60:3 60:6,9 63:25 74:11,14,18,21 78:8,14,18,20 78:22,23 79:9 79:19,21 meetings 33:23 Meggan 1:10,16 3:3 4:7 5:5 76:24 87:2 88:1,5,9 89:10 89:16 member 10:5 34:2 56:24 members 49:22 61:5,5,7 69:1 memory 38:20 78:13 mentioned 62:6 62:7 68:1 mentions 60:23 messages 32:6 32:10 36:9 57:20 58:9,10 58:15,25 59:1 59:4,10 60:14 Michael 2:8 84:2 midway 64:9
		level 16:7 linked 84:24 lips 26:13 little 7:14 64:10 64:18 76:19 Lives 66:5 68:11 69:1,5 LLC 90:20 LLP 2:9 local 1:6 2:13 5:1,4,14 6:20 33:20,21 34:4 83:25 89:7 located 1:21 4:10 location 67:20 locations 4:19 31:20 long 7:15,21 8:9 8:24 9:17 Lacore 43:1 language 53:18 53:20 Las 43:6 44:14 44:16 lasted 74:11 LAUREN 2:21 LAW 2:15 lawsuit 84:8 51:18 54:6 leader 11:16 63:5 76:18,20 leaders 11:14 79:11,13,16 learn 32:5 61:10 leave 9:7 left 9:9 44:5 73:4 74:2 75:11 LEGAL 2:3 let's 14:3 38:24 40:9 43:16 48:21 52:16 62:20,21 63:1 65:10 71:23 75:13 76:1 82:15,16,25 letter 80:17,18 80:25 81:3,6	manager 7:19 8:8,10,14,18 8:22,25 9:13 10:15,19 11:3 11:8 12:9 13:17 14:23 16:7,15 17:7 21:21 23:8 43:7 44:14,15 66:21 70:1,3,7 70:8,22 71:13 71:13,20,25 72:4,5,19 73:7 73:9,15,16,17 73:19,21,23 manager's 71:15 72:1 managers 11:7 14:4,9,19 15:10,14 16:6 16:16 19:5,15 19:19 48:12 66:18,24 67:8 67:19,19,23 70:13 71:2 Matt 5:11 matter 5:12 19:20 20:1 50:24 66:6 68:11 69:2,5 69:17 80:10 matters 15:22 20:7 Matthew 2:3 4:21 43:9,11 Maureen 3:15 56:11,13 63:13 mbg@nrtw.org 2:6 mcorrell@ree...	

65:13,14	need 5:16 6:1	objections 15:1	20:1,5,14,19	54:24 55:2,7
Mike 4:23 39:4	18:10 52:4,8	83:18	20:25 21:5,9	55:16,19,24
mine 17:2	52:11 76:19	objector 84:9,17	21:13,25 22:4	56:2,5,10,13
minutes 82:23	83:15	obtain 65:3,5	22:7,9,14,18	56:16,19,22
83:1 90:13	needed 16:1,9	71:25	22:22,25 23:5	57:1,4,7,12,23
Mischaracteri... 64:24	neither 90:3	obtained 64:21	23:10,13,16,19	57:25 58:2,4,7
Misstates 14:24	never 29:9	occasion 15:9	23:23 24:5,10	58:10,14,22
48:4 52:25	new 70:16 73:5	occasions 15:13	24:13,18 25:1	59:1,3,6,9,15
71:17	newer 16:9	occupation 7:17	25:6,10,13,17	59:20 60:5,12
moment 41:12	nexus 69:4,8,14	occur 23:5,7	25:20,25 26:3	60:16,18,22
41:15,17	69:14	occurred 59:25	26:10,14,19,19	61:3,7,10,20
monitor 28:12	Nine 7:16	69:25	26:23 27:9,20	61:23 62:2,5
monitors 28:10	nods 5:25	offensive 23:2	28:2,5,13,18	62:11,14,17,20
month 9:6 17:16	nonmember	23:16 27:13	29:1,12,18,24	62:25 63:1,1,4
17:17,18	84:10	65:25	30:4,8,16,21	63:6,9,15,17
monthly 17:12	normally 16:11	offered 8:15	31:3,5,11,15	63:20,22,24
months 7:23	27:11	office 16:18,21	31:18,24 32:4	64:4,6,8 65:2,7
8:19	North 2:9	16:25,25 17:1	32:4,8,12,14	65:10,12,23
Moore 14:7	NORTHERN	33:23 59:7	32:16,18,21,23	66:3,7,10,15
41:20	1:1 89:2	61:1 74:17	33:1,5,18,25	66:20 67:1,3,5
morning 5:9,10	NOTARY 88:17	88:14	34:3,5,8,12,14	67:7,18,22
motivated 23:21	noted 88:2	officers 62:8	34:19,22 35:5	68:3,5,10,16
movement 66:6	notes 15:25	offices 2:15	35:12,15,18,21	69:3,12,16,19
69:2	59:13 63:21,22	10:12	36:4,7,18,24	69:23 70:2,6
multiple 69:9	notetaker 16:1	Officially 8:11	37:14,21 38:2	70:12,18,21
73:4	November 1:10	9:9	38:10,15,24	71:2,6,11,23
Mumford 90:21	1:19 4:3 87:3	officials 61:1,6	39:14,19,21	72:4,12,25
mute 82:12	89:10 90:16	okay 5:19 6:9,15	40:2,2,5,9,19	73:13 74:1,5,5
<hr/>				
N				
N 2:1	number 17:8	6:18,24 7:3,7,7	40:23 41:1,3,5	74:10,13,16,18
name 4:13 5:9	31:25 36:20	7:14,17,21,24	41:10,17,25	74:21 75:2,10
5:11 29:16	37:10,10,17	8:2,5,9,17,20	42:3,7,16,19	75:18,23,25
66:7,20 73:23	39:23 51:20,21	8:20,24 9:7,10	42:23 43:8,17	76:14 77:2,4,6
87:2 88:10	54:7 62:23	9:12,17,21,24	44:8,12,15,21	77:8,13,20
named 25:15	63:2 76:5,7	10:2,5,9,9,11	44:25 45:6,10	78:1,7,12,16
names 14:6	numbered 1:18	10:20 11:2,5	45:16 46:7,13	78:24 79:2,4,8
66:23 67:1	37:18 39:6,10	11:11,21,25	46:16,19,23	79:19,24 80:3
Naomi 42:25	O	12:2,4,7,22	47:2,5,8,15,18	80:6,9,12,16
NATIONAL 2:3	oath 4:15 88:10	13:3,6,9,16,20	47:18 48:1,11	80:19,21 81:2
nature 15:23	object 84:14	13:25 14:3,6,8	48:15,21 49:1	81:8,11,14,18
16:4 23:3	objection 14:24	14:11,21 15:5	49:5,8,19,22	81:23 82:2,5,9
27:14 51:2,4	19:7 29:21	15:12,16,21	50:1,4,7,15,18	82:9,18,21
53:4,8	42:11 48:4	16:3,14,14,18	50:21,23 51:1	83:2,6 86:7
necessarily 19:1	52:25 64:23	16:21,24 17:3	51:10 52:2,12	once 37:23
70:15	67:15 70:9	17:9,11,23,25	52:16,22 53:7	39:21 54:11
	71:8,17 73:2	18:3,6,6,9,9,18	53:13,17 54:2	ones 22:18
		19:3,10,18,22	54:2,6,6,10,13	ongoings 34:25

open 37:12 39:22	17:6	80:3	59:15	79:4	
operating 66:13	participating 46:16	policies 14:15 26:20 27:6	preparing 5:22 81:6	provided 78:9 78:18 79:12,16	
opinion 80:4	particular 15:21 29:12	policy 20:8,12 20:15,20 21:2	present 2:19 53:13	80:7	
opposed 85:19	parties 90:5	21:11,23 22:16 22:21 23:1	presented 78:23 78:25	provisions 1:25	
opt-out 84:13	party 89:25 90:2 90:10	24:7,11,16,23 25:2,8,11,23	president 32:22 32:24	proximity 16:15 16:22	
oral 89:17	pass 83:22 86:2	26:21 27:2 49:18 52:18	pretty 78:9	PUBLIC 88:17	
order 1:23 4:9 72:1	Patrick 67:6 68:4	56:21 80:14 65:20,24 66:4	previous 11:7	purposes 88:11	
ordinarily 19:18 27:9	pending 83:15	74:7	primarily 15:25 26:2	pursuant 1:22 89:20	
original 55:4	person 11:9 16:1 73:5 88:10	political 65:16 65:20,24 66:4	prior 8:5,19,20 9:12,22 14:25	put 29:9 33:8	
outcome 90:9	personal 43:14 84:12 85:11,14	73:12	21:15 33:15 35:21 46:19	puts 32:25 33:1 33:5	
outcomes 33:24	personally 20:9 57:22 85:2 88:9	position 7:22,25 8:6,6,15 9:4,7 12:18 85:5	Q		
oversaw 56:20	petition 61:6,8 62:7,8,18	positions 12:7 83:19	question 6:4,6 6:10 15:2,3,6 19:8 29:5 31:10 53:3 72:7		
<hr/>					
P	Phoenix 8:8,10 8:14,21 23:8 34:14 66:14,19 66:21,24 67:9 67:20 69:25 70:2,6,13 71:3	possible 46:2 73:12	pro-choice 85:3 85:19	questions 5:15 5:20 77:23	
p.m 39:17 83:8 83:11 86:6	Phoenix-based 22:20,22	Possibly 64:15	pro-life 84:25 85:3,7,12,18 85:23	78:2 83:13 84:1,7 86:4	
page 36:20,20 37:7,16,22 40:13,18 41:11 47:1,3,4,6,9,12 47:16,24 51:25 52:2 62:22 63:2,18 64:13 65:6 69:13 76:1,25 77:4 77:12,15 87:4	phone 33:22 64:3	post 23:2,16,24 42:21 45:4,8 45:14 60:23 61:25 65:15 68:10,13 69:5	probably 82:10 82:19	quick 39:8 43:13 55:9 84:6 quite 31:18	
pages 40:10,21 63:8,18,20	posted 65:24 66:8	posting 64:13 65:20 74:7	problem 19:10 76:11 77:19	<hr/>	
paragraphs 38:16	posting 64:13 65:20 74:7	postings 58:9,11 58:15	Procedure 1:23 89:21	R	
Parker 34:7,23 35:6 61:17,20 61:24	posts 32:6,10 36:9 47:19	posts 32:6,10 48:2,13,16	Proceedings 4:1 86:11	R 2:1	
part 40:11,12 42:3,7,8,14,17 44:6 46:8,14 46:23,24 47:22 48:8 59:21 65:17 80:23 82:5 84:7	planned 79:9	57:20 59:10,25 60:14 61:21	process 46:21,25 68:5 71:22	racially 23:21	
participate 45:21,23	play 84:17	64:14 66:4,8	72:24 81:25	Railway 7:5,10	
participated	please 4:5,18 41:12,15,17	68:16,17,21	82:5,7 84:22	Ralph 25:16,17 26:1	
	55:10 77:10 86:10	69:12	produced 1:17	re- 7:9	
	PLLC 2:15	potential 10:24 15:24 27:16,22	profess 85:15	reached 74:2 80:9 81:15	
	point 5:16 13:2	49:15 52:17	professed 85:23	read 6:12 51:13 51:16 54:11,12 88:1	
		prepared 59:13	protected 51:8 51:11 52:5 53:11,14	reading 86:9 real 39:8 55:9 really 6:17 38:4	
			proved 88:10	reasserts 83:17	
			provide 78:3	recall 9:5 13:25 14:2 22:5,6,14	

22:19 24:8 25:12,14 27:24 28:9,17 29:2 31:8 32:7,8 33:12 35:14 36:2,10,12,14 36:14,16 41:12 45:15,17 46:16 47:10,11,13,15 47:17,23,25 48:1,6,14,17 48:18,20 50:20 56:1,9,12 57:11,12,14 58:12,14 59:2 59:3,18 60:15 60:24,24,25,25 61:6,11,18 62:2,6,17 66:22,23 68:12 69:15 74:20 75:1 79:7,10 79:14 80:12 81:17,18 receive 32:11 49:23 57:22 received 20:21 32:2,13 39:17 57:21 58:2 80:16,20,24 receiving 32:9 45:10 55:7,14 Recess 43:25 75:7 recipients 38:8 recognition 10:23 recognize 38:3 38:13 40:3 54:14,15 63:10 63:17 record 1:25 4:3 4:19 6:3 19:12 43:23 44:2 75:3,5,9 82:22 83:7,11 86:5	89:18 90:8 REED 2:9 refer 48:22 reference 53:25 referred 29:17 referring 21:15 52:13 refresh 38:19 78:12 regard 38:18 79:6 regarding 1:24 4:9 56:8 81:15 region 14:4 66:11 Registration 90:23 regular 11:12,21 90:4 relation 16:24 66:5 relations 8:3 49:10,20,23 50:24 51:6,9 52:8,19,24 53:10,12 54:4 54:20 81:14 relative 90:7 religion 84:22 religious 28:15 28:17,19,23 29:7,10,13,19 30:2,19 31:21 32:1 52:10,13 52:14 53:25 85:24 remark 26:11 remarks 26:6,8 remember 12:17 12:19,23,24 13:1 20:17 22:9,10,13 23:13,15,18,20 23:22,23 24:1 24:5,13,17,19	24:20,24 25:11 25:25 26:9,10 26:22,23,24 27:3,4,8 28:5 29:6 31:14,15 31:17 34:21 35:5,7,9,20 40:7 41:9,24 45:20,22,23 46:3,4,10 47:13 50:4 57:16,19 60:4 61:16 65:4,7 67:7,17 68:17 70:7 74:6 75:17,18 78:16 78:19 79:1,2,3 79:18,23 80:1 80:5,11 remotely 4:8,15 89:11 remove 62:8,11 removed 62:15 render 33:23 reopen 83:14 reopened 83:21 repeat 15:6 48:3 rephrase 72:7 replaced 72:15 reply 55:1 report 7:24 11:2 11:5,19,25 12:12 13:13,14 13:23 reported 11:9 11:20 12:3,5,8 12:13,20,25 13:4 23:4,14 26:5 27:10 32:5 60:1 89:11 reporter 1:20 4:4,6,14 5:22 76:4,9,11 80:22 81:1 86:7 89:14	42:17 44:3 45:8 48:21 50:11 52:2,3 56:5 57:7,15 62:9 77:19,21 81:5 83:14 right-hand 37:18 rights 6:21,21 7:4,9 Road 2:4 role 70:3,16,16 71:22 84:17 roughly 17:19 routine 52:18 rule 18:19 26:4 89:21,22 Rules 1:22 89:21 run 51:8 52:8,11
S			
S 2:1 saw 47:23 59:18 saying 36:15 79:10 says 37:17 38:5 41:25 45:1 55:10 64:9,12 64:17 65:13,14 78:7 schedule 33:23 Schneider 3:15 11:4,6 18:16 19:13 41:19 retaliated 7:9 retaliation 25:4 review 37:23 40:15 49:3 75:15 78:3,13 79:5,8 81:4 Schneider's 16:22,25 screenshots 40:21,23 47:24 58:8 screw 39:1 screwed 39:3 scroll 76:16 77:6 scrolling 76:22			

seal 88:14	87:1 88:1	20:8 24:11	Stephensen 3:11	SWA 39:23
second 37:8	89:23	25:2 27:1	3:13 42:5,25	51:21
40:13 75:4	signing 86:9	31:20	43:3 44:9,10	SWA00 37:17
see 14:3 37:9	singing 26:15,16	speaks 42:12	44:13,18,22	SWA004436
38:24 40:9	single 52:22	specific 14:13	45:3	37:19,25
41:1 42:7	situation 43:15	19:17 30:22	stewards 33:21	swear 4:5,11
48:21 52:16	SMITH 2:9	36:20 45:18,23	34:20	sworn 5:6 89:17
62:20,21 63:1	social 20:8,11,15	67:11 68:12	Stone 3:11 32:17	90:15
65:10,13 76:2	20:20 21:2,11	79:15	32:19,21 33:11	system 31:20
77:4,21 78:6	21:23 22:10,16	specifically 15:1	42:5,25 46:8	
81:11 82:25	23:1 24:6	24:18 31:8	46:14 55:10,14	T
seen 40:6,8,23	28:11 59:25	47:10 56:23	57:17,21 62:12	take 5:17 9:20
57:19 59:17	65:21 74:7	76:1	62:14	15:25 19:8
selected 36:16	80:13	specifics 36:3	stopping 43:12	37:22 39:22,22
send 51:5 52:23	somebody 71:14	58:12 79:1	Street 2:15	40:10 43:13,17
53:10 57:25	85:9	speculation 19:8	90:21	49:2 60:16
76:8 86:8	song 26:15	29:22 71:9	structure 12:16	63:5 77:13
sends 41:18 55:9	Sonya 43:1	split 13:2	subscribed	79:6 82:11
senior 7:19	sorry 12:21 13:9	Springfield 2:5	88:10 90:15	taken 1:18 43:25
sent 37:9 39:4	15:6 21:14,19	4:22	successful 62:3	75:7 90:6
44:22 47:20	23:25 37:5	SPURLOCK	successor 71:6	talk 6:2 16:10
53:6,12 54:2	39:3 42:23	2:19	Suite 2:4,9	48:11 55:25
57:20 75:24	43:12 47:2,20	staff 10:17,25	Sullivan 34:7	61:17,20 64:11
80:18,25 81:3	48:3 68:14,15	stage 74:1	35:13,16,18	64:12 74:18
81:12	77:11,16 80:22	standards 30:12	55:23,25 64:1	talked 46:7
sentence 64:11	84:2	start 8:17 9:3	super 82:7	48:15 56:10
64:11	sort 31:6,12	75:13	supervise 13:6	61:15
sequential 40:17	46:20	started 8:13	supervisor 9:15	talking 33:12
set 55:10,13,17	sorts 33:18	9:19 36:5 45:7	9:18 11:17	35:5 53:23
57:12	34:22 35:22	45:19 46:21	14:1	75:11
setting 57:9	sounded 68:21	61:5,7 70:18	supervisors	Tammy 8:1
sexual 25:3,23	68:22,24	starts 76:25	11:13 12:10,11	22:24,25 23:14
26:2,21 27:1	Southwest 1:5	state 1:21,24 4:9	12:25 13:14	23:17 24:2
Shaffer 8:1	2:7 4:24 5:13	4:12,18 88:7	support 10:17	team 12:15 13:1
shifting 7:14	6:19 7:8,15,18	88:18 89:14	10:18,18,22	29:17,18 30:5
shop 33:21	8:2,6 9:19,21	stated 1:25	supported 56:25	30:8,10 31:12
34:20	12:8 23:3 24:6	26:12	sure 6:1,5 21:20	49:14,16,23,25
Shorthand 1:20	24:20 26:25	statement 51:17	39:24 40:1	50:2,5 52:9,11
89:13	28:6,10 29:13	52:12	43:16 45:19,19	56:24
show 58:7 59:6	29:25 30:4	statements 52:9	52:1 76:21	Ted 67:4 68:6
showed 58:3,4,8	32:1 44:19	STATES 1:1	77:9,10	Telephone 90:22
58:11	56:7 64:15	89:2	Suzanne 3:11,13	tell 12:16 15:1
shows 64:19	65:17,19 69:5	status 84:16	42:1,5,25 43:3	38:10 59:24
sic 34:25 49:16	69:10,14 83:17	stenographic	44:9,10,12,18	60:2 79:8 85:9
side 82:8	89:6	4:16	44:22 45:1,3	telling 73:6
signature 3:7	Southwest's	step 71:23	45:13	temporary 8:18
				tend 43:15

term 11:15 52:6 52:20,23 53:6 53:24 terminate 67:13 70:4,14 71:4 72:20 73:9,15 77:23 81:21 84:18 85:20,25 terminated 21:10,22 22:21 22:23 24:2 26:19 66:2,17 67:20 74:7 80:13 termination 22:12 25:20 70:8,25 73:17 75:21 80:17,18 81:3,6,16 84:22 terminations 21:25 22:2,4 22:15 24:6,9 terms 18:20 testified 5:6 testifying 75:18 testimony 14:25 48:5 53:1 71:18 76:17,18 77:1,5 89:18 Texas 1:1,21 2:10,16 4:17 4:24 5:2,4 89:2 89:14 90:21 Thank 15:3 37:14 38:2 40:2 43:22 52:1 74:5 77:2 81:1 theirs 16:19 thing 51:22,23 77:14 things 10:25 16:1 49:18 69:13 think 24:18	31:18 37:2,3 39:4 40:18 44:5 62:7 75:11 83:12 thinking 39:5 82:14 Thornton 67:4 three 7:23 9:1 67:23,25 70:10 Thursday 38:6 time 4:4 12:1 19:8 21:17,20 31:16 32:18 43:6 51:7 61:2 70:17 71:21 72:5 73:17,19 76:20 77:13 81:25 83:13 84:1 90:10 times 70:10 73:4 title 6:21 9:11 49:15,16 today 5:15 15:1 Today's 4:3 told 72:15 73:4 top 28:3 38:5 totally 77:12 trade 56:2 transcript 5:23 89:17,23 transitioned 70:16 Transport 1:6 2:12 5:13 6:19 89:7 treated 84:8,21 trial 84:1 trips 13:23 true 70:15 88:2 89:18 try 76:22 trying 71:12 72:8,11 73:8 tunnel 31:4 turn 27:12 52:19 turning 27:15	41:10 two 25:12,13 48:12 60:5,8 68:9 TWU 5:1,4 83:25 type 16:12 types 15:16,21 20:9 35:15 36:2 typical 27:24 typically 53:5 U uh-huhs 5:24 understand 6:6 6:9 16:10 29:5 30:15 71:12 72:9 73:8 84:7 84:20,24 understanding 31:5 understood 6:11 uniform 30:12 30:13,23 64:16 64:20 69:11 uniforms 30:19 union 1:6 2:12 5:14 6:20,25 7:8,11 10:5,9 10:12 32:22,24 32:25 33:1,5 33:15,19 55:19 55:22 61:1,5 62:8 84:14,14 84:17 89:7 UNITED 1:1 89:2 updates 35:1 use 53:5,24 uses 52:6 V v 5:13 variety 11:1 vary 12:15 17:16	Vegas 43:6 44:14,16 verbal 5:24 verify 76:16 VIDEOGRAP... 2:19 4:2 43:23 44:1 75:5,8 82:22 83:7,10 86:5 videotaped 1:9 4:6 view 85:2 views 52:10,13 52:15 54:1 65:17,21,24 74:7 84:25 85:12,23 violated 6:21 7:1 7:4 26:4 violating 24:15 25:8,23 violation 15:8 18:11,15,23 20:12,15,20 21:2,10,22 23:1 24:7,22 26:1 27:1,6,17 27:22 28:8 80:13 violations 10:24 14:18 15:17,19 17:4 18:20 19:4,14 20:8 22:10 26:20 27:10 52:18 violence 68:23 68:25 violent 68:21 violent-soundi... 68:18,20 Virginia 2:5 4:22 virtual 77:14 visible 31:2 VP 82:2,6,8 VS 1:4 89:5 work-violation	W want 39:24 52:1 76:2,16 77:15 77:22 82:13,21 86:8 wanted 59:11,13 59:15,20 68:22 68:24 wasn't 71:22 72:15,22 73:16 80:1 way 5:19 11:18 14:16 25:23 26:24 27:25 29:4,8 31:19 40:14,16 48:19 67:12 69:4,21 70:22 82:20 ways 27:17 we're 73:1,2 wear 30:25 wearing 30:12 West 10:4,7 wide 11:1 witness 1:17,21 4:5,10,12 15:5 19:10 37:14 39:19 43:19,21 77:2 83:4,13 83:22 86:2 87:2 89:16,19 word 13:11 work 2:3 9:21 10:3,24 14:11 14:15,17,18,22 15:8,9,13,16 15:17,20,25 16:15 17:4 18:10,10,15,19 18:19 31:19,25 34:14,17 35:12 35:16,18 36:16 44:18 56:20 61:14,15 64:19 83:1 work-violation
---	--	--	--	--

14:23 17:5,12	0	2020 1:10,19 4:3	5
worked 7:15		87:3 88:14	5 3:4
8:18 9:24 10:6	1	89:10 90:16	50 18:3
35:7,10 67:11	1 3:12 38:25	214 2:16	556 1:6 2:13 5:1
Workers 1:6	39:2 40:16	22160 2:5	5:4,14 6:20
2:12 5:14 6:20	41:22 42:9	23rd 38:7	83:25 84:10
89:7	47:22 51:19	2850 2:9	89:7
working 8:20	60:17,20,21	2docs.PDF	
21:18,20 23:7	10 17:25 18:2,6	37:13	6
28:14 29:24	20:23		6 3:15
30:4 34:8	10-31-21 90:20	3	600 2:4
35:14,21 36:5	10:10 43:24	3 3:11 39:5,12	62 3:15
36:14	10:28 44:2	3:17-CV-0227...	680-4264 2:10
workplace 18:15	11:22 75:6	1:4 89:5	
18:23 19:3,13	11:34 39:17	30 82:25 83:6	7
24:11,15,22	11:44 75:9	30(e)(1)(A)	7 6:21 39:12
65:16	12 77:21	89:21	49:15,16
works 5:19	12:00 83:8	30(e)(2) 89:22	7015 90:21
82:24	12:35 83:11	3301 2:15	703 2:5
worries 84:3	12:38 86:6	3469 4:14 90:19	75201 2:10
wouldn't 18:25	12th 90:15	36 3:13	75226 2:16
wrist 31:1	14-year-old	38 90:23	75252 90:21
written 5:22	26:18	39 3:11	770-3339 2:5
wrote 81:8	1500 2:9		
X	181 76:25 77:3,4	4	8
xx 89:24	182 76:25	4 1:10,19 3:13	8001 2:4
Y	19 78:2	36:19,22,23	84 3:5
yeah 11:16	1docs.PDF	37:4,6,6 87:3	87 3:7
14:14 15:7	39:16	89:10	89 3:8
36:23 38:1	2	4226 40:1 51:24	
40:1,14,14	2 3:2,14 36:19	51:25	9
41:16 43:16	36:25 37:3,6,7	4227 40:13	9 3:16 62:22,24
51:18,22 60:21	37:7 39:12	4228 60:19	63:2
72:8 77:10	41:11,14 44:6	4233 40:18	9:05 1:19 4:4
78:23 82:12	48:22 54:7	4436 36:20	939-9223 2:16
year 8:11,12	90:13	41:14,15 42:9	972-931-1199
17:21 18:1,2,4	2:16 90:12	44:4	90:22
18:7 20:21,23	20 18:7 78:2	4450 48:23,24	972-931-2799
32:2	2011 9:19,22	4459 54:7,8	
years 7:16 9:2	2015 9:5	45 82:23	
9:20	2017 12:19 14:9	4675 62:22 63:3	
yesterday 39:18	38:7 50:2	63:7	
Z	2018 9:8	4679 64:7	
	2019 8:16,17 9:9	4680 65:11	
	23:11	469 2:10	
	202 76:1 77:7,17	4th 4:3	